

FILED

JUN 04 2024

CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA
SAN JOSE OFFICE

(5)
SMC
NP
NC

Austin de Tagle
1645 Parkside Ave
San Jose, CA
(408) 590-4838
Orlandosanchezdetagle@gmail.com
Pro Se Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

Austin de Tagle

Plaintiff(s),

vs.

The Law Offices of Dennis R. Ingols ,
Elizabeth Sanchez

Defendant(s).

)
) **COMPLAINT**

)
) **DEMAND FOR JURY TRIAL**

C

24 03355 VKD

PARTIES

1. Plaintiff

Name: Austin de Tagle

Address: 1645 Parkside Ave. San Jose, CA 95125

Telephone 408-590-4838

2. Defendant

1 Defendant 1:

2 Name: Dennis R. Ingols

3 Address: 111 N. Market St. suit 300 San Jose, CA 95113

4 Telephone: 408-601-0126

5 Defendant 2: Elizabeth Sanchez

6 Address: 841 Monticelli Dr. #209 Gilroy, CA 95020

7 Telephone: 408-601-0126

8
9 **JURISDICTION**

- 10 1. This court has jurisdiction over this complaint because it arises under the laws of the United
11 States. 18 U.S.C 241 American Disabilities Act 1990. 18 U.S.C 241 14th amendment
12 (parental rights) 1331, 1332. 18 U.S. C 241 14th amendment (invasion of privacy), 18 U.S.C
13 HIPPA Privacy Act.

14
15 **VENUE**

- 16 2. Venue is appropriate in this court because the defendant resides in this district, and a
17 substantial amount of the acts and omissions giving rise to this lawsuit occurred in the
18 Northern District court San Jose Division. 28 U.S.C 1391

19
20 **INTRADISTRICT ASSIGNMENT**

- 21
22 3. This lawsuit should be assigned to the San Jose division of this court because a substantial
23 part of the events or omissions which give rise to this lawsuit occurred in Santa Clara
24 County.

25
26
27 **STATEMENT OF FACTS**

- 1 **4.** I am a veteran and qualified person under the American Disabilities Act 1990 and receive
2 governmental benefits from the state of California.
- 3 **5.** I suffer from Anxiety, depression, been diagnosed with PTSD, acute stress, I had one
4 flashback on February 19,2023 and suffer from neurological damage to my left side
- 5 **6.** My mental health comes and goes, I suffer from insomnia, this has all been in the past one
6 year.
- 7 **7.** I have been denied of my parental rights and did not consent to child support; it violates my
8 constitutional rights.
- 9 **8.** I am fully capable of caring for my children and Elizabeth Sanchez has denied my children
10 their civil rights to a father.
- 11 **9.** She has denied me any say in my children's life for no reasons under the law.
- 12 **10.** She continues to withhold my children from me as it has affected me emotionally and
13 psychologically. She uses restraining orders to prevent my children and I from being
14 together.
- 15 **11.** Elizabeth Sanchez is fully aware of my disability and the state governmental benefits I
16 receive.
- 17 **12.** I have tried everything available to me to see my children, I have asked for mediation and
18 she denies me and my children to see each other. That is detrimental to my mental health
19 and emotions as it is also to my children.
- 20 **13.**
- 21 **14.** Dennis R. Ingols as an attorney has falsely accused me of crimes, I did not commit in 2021
22 and legal documents have been deleted from case 17CP00082, GC6201.
- 23 **15.** Dennis R. Ingols is the attorney for Elizabeth Sanchez who is the mother of my son and
24 daughter.
- 25 **16.** I am a United States military veteran who is a qualified individual under the American
26 Disabilities Act 1990.
- 27
- 28

1 17. I have been diagnosed with PTSD, Acute stress, Anxiety, Depression, I have had one
2 flashback, neurological damage to my left side, and an ear injury to my left side while in the
3 military.

4 18. Dennis has falsified facts on declarations in order to take from me, I am currently receiving
5 governmental benefits from the state for my disabilities.

6 19. I have been harassed by Dennis R. Ingols and intimidated in emails; I have had to change
7 my email counts two times.

8
9 **First Claim**

10
11 **Name the law or right violated:**

12 American Disability Act 1990 Sec 12111

13 Name the defendants who violated it: Dennis R. Ingols

14 20. I have called San Jose Police; I have gone down to the San Jose Police Department to seek
15 help; I have filed for civil harassment and I still receive unwanted e-mails that do not pertain
16 to only the needed documents of being served.

17 21. Dennis has taunted me in emails I do not reply too.

18 22. Dennis has been unprofessional and shown his misconduct as an attorney.

19 23. I told Dennis he has been a direct threat to my health, but is always attempting to affect me
20 emotionally in his emails I blocked by calling me a "deadbeat dad" "pay your child support"
21 "produce discoveries" "take your meds" "you lose" that he has no business harassing me for.

22
23 **Second Claim**

24
25 **Name the law or right violated:**

26 American Disability Act 1990 Sec 12203

27 Name the defendants who violated it: Dennis R. Ingols

- 1 1. Dennis has intimidated me and threatened me with jail for not producing medical
- 2 information and using a good cause report.
- 3 2. Dennis has committed perjury in civil court to take my governmental benefits from me and
- 4 having me pay for attorney fees in retaliation.
- 5 3. He has prevented me from enjoying my right granted and protected by this chapter.
- 6 4. He has retaliated after I served his client a Supreme Court case that was then served by an
- 7 Appellate court case. He insults me, and send me videos of him throwing my cases away
- 8 that are meant for his client in order to have my parental rights back.
- 9

10 Third Claim

11
12 **Name the law or right violated:**

13 American Disabilities Act 1990 Sec. 12212

14 Name the defendants who violated it: Dennis R. Ingols

- 15 5. Dennis R Ingols has not respected my civil rights or my constitutional rights as a father.
- 16 6. Rather than seek resolution and ensure my children have their father in their life, and I have
- 17 my rights to upbringing and say in my children's life he does everything he can to force me
- 18 to pay child support.
- 19 7. He extorts me for money I do not have, and violates my children's rights to a father for no
- 20 reasons under the law with ensuring restraining orders stay on them.
- 21 8. This is also retaliation, there is no need for him to do the things he does when it could be
- 22 very simple by supporting joint custody and stop with the restraining orders and trying to
- 23 take from me.
- 24

25 Fourth Claim

26
27 **Name the law or right violated:**

28 American Disabilities Act 1990 Sec. 12205

1 Name the defendants who violated it: Dennis R. Ingols

2 9. I seek attorney fees in this matter against Dennis R. Ingols

3 **Fifth Claim**

4 **Name the law or right violated:**

5 HIPPA Privacy Law

6 Name the defendants who violated it: Dennis R. Ingols

7 10. Dennis R. Ingols in his discoveries request and harassment in emails for them is a violation
8 of HIPPA privacy law.

9 11. I can't share that information with him unless its is volunteered

10
11 **Sixth Claim**

12 **Name the law or right violated:**

13 American Disabilities Act 1990 Sec. 12111

14 Name the defendants who violated it: Elizabeth Sanchez

15 1. Elizabeth Sanchez with holding my children from me has affected me psychologically and
16 emotionally.

17 2. My children have been without a father because she won't allow my children to see me.

18 3. I last saw my children April 5, 2023.

19 4. I struggle constantly with my mental health and she is aware of the affects it has had on my
20 children and I.

21 5. She is a direct threat to my health; she has put frivolous restraining orders on my children to
22 keep them away from me with no reason under the law.

23 6. This has contributed to my anxiety and depression; the acute stress is painful.

24 7. She makes fun of my mental health and does everything to hurt me emotionally through her
25 attorney as I deal with my mental health disability.

26 8. The thoughts and emotions of knowing my children cry for their daddy eats at me all the
27 time.

1 9. I have done nothing to my children for them or me to deserve this emotional torture of being
2 kept apart by Elizabeth Sanchez.

3
4 **Seventh Claim**

5
6 **Name the law or right violated:**

7 American Disabilities Act 1990 Sec. 12132

8 Name the defendants who violated it: Elizabeth Sanchez

9 10. I am a qualified individual with a disability and Elizabeth Sanchez has had me be excluded
10 from participating and being denied the benefits or services, programs or activities of a public
11 entity.

12 11. Elizabeth Sanchez rather takes from me by opening a child support case, when I could care
13 for my children using social services as I qualify for these things which includes getting help
14 to pay for school and child care.

15
16 **Eighth Claim**

17
18 **Name the law or right violated:**

19 American Disabilities Act 1990 Sec. 12203

20 Name the defendants who violated it: Elizabeth Sanchez

21 12. I used a Good Cause Report approved by the Deputy District Attorney Guiselle Espinoza for
22 the best interest of the parent and child.

23 13. Elizabeth Sanchez in return retaliated because by filing frivolous restraining orders on my
24 children.

25 14. Elizabeth Sanchez has done this in the past in the year 2021 for no reasons under the 14th
26 amendment then suddenly drops it.

1 15. Elizabeth Sanchez files a restraining order against me for herself for no reasons under the 14th
2 amendment due process clause, and then is seen in my neighborhood grocery store.

3 16. I fear for my safety because she is malicious.

4 17. I been told my children go to school very close by to my home in San Jose, I am afraid I will
5 bump into her and my children and she will call the police on me.

6 18. I fear for my life and the repercussions by law enforcement, such as false arrest that she has
7 put me through in 2019 and other law enforcement interactions.

8 19. She has lied on legal documents submitted into family court case 17CP000822 that affected
9 my mental health. Those documents have since been deleted from the case, GC6201.

10
11 **Ninth Claim**

12
13 **Name the law or right violated:**

14 American Disabilities Act 1990 Sec 12212

15 Name the defendants who violated it: Elizabeth Sanchez

16 20. I was given a mediation hearing as it is appropriate for the situation to ensure my children
17 and I maintain a relationship and she would not participate.

18 21. Participation in mediation would have resolved the disputes arising under this chapter as well
19 as the need for my children to have their father in their life.

20
21 **Tenth Claim**

22
23 **Name the law or right violated:**

24 Parental rights

25 Name the defendants who violated it: Elizabeth Sanchez

26 22. Elizabeth Sanchez and I agreed to have my son attend Willow Glen Elementary School as
27 well as my daughter.

1 23. She pulled my son and daughter out of school without my consent and I currently have no
2 idea where they go to school or live.

3 24. She has denied me the right to upbringing and a say in my children's education under the 14th
4 amendment.

5 25. My son and daughter have been denied equal protection under the 14th amendment and
6 denied their rights to a father under the care of Elizabeth Sanchez.

7 26. She places restraining orders to prevent me from being in their life.

8
9 **Eleventh Claim**

10
11 **Name the law or right violated:**

12 American Disabilities Act 1990 Sec. 12205

13 Name the defendants who violated it: Elizabeth Sanchez

14 I ask for attorney fees from the prevailing party in this matter for violating my civil rights

15
16
17 **DEMAND FOR RELIEF**

18 I seek compensatory damages of \$300,000.00 and the disbarment of Dennis R. Ingols

19 I seek compensatory damages of \$30,000.00 and join custody of my children.

20
21
22 **DEMAND FOR JURY TRIAL**

23 **24.** Plaintiff demands a jury trial on all issues.

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25
26 Respectfully submitted,

27 DATED: May 31, 2024


AUSTIN DE TOGLE

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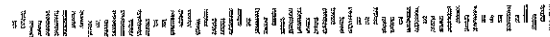
DISABILITY INSURANCE
PO BOX 637
SAN JOSE CA 95106-0637



2525XX10161



RETURN TO: ----->



DISABILITY INSURANCE
PO BOX 989605
WEST SACRAMENTO CA 95798-9605

Mailing Date

09112023

AUSTIN O SANCHEZ DE TAGLE
1645 PARKSIDE AVE
SAN JOSE CA 95125-3337

EDD Employment
Development
Department
State of California
(800) 480-3287

PHYSICIAN/PRACTITIONER'S SUPPLEMENTARY CERTIFICATE

EDD Customer Account Number (EDDCAN)	CLAIM ID	SSN/ECN	CED
	DI-1011-113-053	XXX-XX-2226	03-22-2023

Claimant Instructions: If you are still disabled, contact your physician/practitioner immediately for completion of the Physician/Practitioner's Supplementary Certificate which must be submitted within twenty (20) days of the mailing date shown above or you may lose additional benefits.

Instrucciones al Solicitante de Beneficios: Si Ud. aun sigue incapacitado, comuníquese con su Médico/Profesional (Medico) lo más pronto posible para completar el documento titulado en inglés "Physician/Practitioner Supplementary Certificate" el cual debe ser presentado dentro de un plazo de veinte (20) días de la fecha de envío indicada arriba o de lo contrario es posible que pueda perder beneficios adicionales.

Physician/Practitioner Instructions: For faster processing, the physician/practitioner may complete and submit this form online at www.edd.ca.gov. If this form is submitted online, you do not have to mail this form back to EDD. When completing this form, PLEASE PRINT WITH BLACK INK.

1. ARE YOU STILL TREATING THE PATIENT?		<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	DATE OF LAST TREATMENT	08072023
2. WHAT CURRENT CONDITION(S) CONTINUES TO MAKE THE PATIENT DISABLED? (DIAGNOSIS REQUIRED, IF MADE)					
Depression					
Anxiety					
Pbld					
3. DATE OF NEXT APPOINTMENT					
11012023					
4. ICD DIAGNOSIS CODE(S) FOR DISABLING CONDITION THAT PREVENT THE PATIENT FROM PERFORMING HIS/HER REGULAR OR CUSTOMARY WORK (REQUIRED)					
EXAMPLE OF HOW TO COMPLETE ICD CODES	ICD-9	320.1	(Check only one box)	PRIMARY	F43.10
	ICD-10	G00.1		SECONDARY	
				SECONDARY	
				SECONDARY	

ADDITIONAL QUESTIONS ON FOLLOWING PAGES





2525XX10162

5. DESCRIBE HOW THE PATIENT'S PRESENT CONDITION/IMPAIRMENT PREVENTS HIM/HER FROM RETURNING TO HIS/HER REGULAR OR CUSTOMARY WORK.																																							
N I G H T M A R E S																																							
A U D I T O R Y H A L L U C I N A T I O N S																																							
D E P R E S S I O N																																							
6. WHAT FACTORS OR COMPLICATIONS ARE DISABLING THE PATIENT LONGER THAN PREVIOUSLY ESTIMATED?																																							
L E G A L I S S U E S A R E A N E X C A R B A T I N G S T R E S S O R																																							
7. IF PATIENT WAS HOSPITALIZED, PROVIDE DATES OF ENTRY AND DISCHARGE																																							
															TO																								
<input type="checkbox"/> CHECK HERE TO INDICATE THE PATIENT IS STILL HOSPITALIZED															Not applicable																								
8. DATE AND TYPE OF SURGERY/PROCEDURE PERFORMED OR TO BE PERFORMED																																							
9A. ICD PROCEDURE CODE(S) <input type="checkbox"/> ICD-9 <input type="checkbox"/> ICD-10																																							
Not applicable																																							
9B. CPT CODE(S) (DO NOT INCLUDE MODIFIERS)																																							
10. CURRENT ESTIMATED DATE PATIENT (EVEN IF STILL UNDER TREATMENT) WILL BE ABLE TO PERFORM HIS/HER REGULAR OR CUSTOMARY WORK ("UNKNOWN," "INDEFINITE," ETC., NOT ACCEPTABLE)																																							
11.01.2023																																							
<input type="checkbox"/> CHECK HERE TO INDICATE PATIENT'S DISABILITY IS PERMANENT AND YOU NEVER ANTICIPATE RELEASING PATIENT TO RETURN TO HIS/HER REGULAR OR CUSTOMARY WORK																																							
11. WOULD DISCLOSURE OF THE INFORMATION ON THIS FORM BE MEDICALLY OR PSYCHOLOGICALLY DETRIMENTAL TO YOUR PATIENT?																																							
																									YES					NO									

ADDITIONAL QUESTIONS AND SIGNATURE REQUIRED ON NEXT PAGE



For Official Use Only

EDDCAN

Claim ID

SSN/ECN

CED

DI-1011-113-053

XXX-XX-2226

03-22-2023



2525XX10163

12. PHYSICIAN/PRACTITIONER'S LICENSE NUMBER												13. STATE OR COUNTRY (IF NOT U.S.A.) THAT ISSUED THE LICENSE NUMBER ENTERED IN QUESTION 12											
C 5 4 3 9 5												STATE CA COUNTRY USA											
14. PHYSICIAN/PRACTITIONER'S NAME (FIRST) (MI) (LAST) (SUFFIX)																							
S H A I L I J A I N																							
15. PHYSICIAN/PRACTITIONER LICENSE TYPE												16. SPECIALTY, IF ANY											
M E D I C A L												P S Y C H I A T R Y											
17. PHYSICIAN/PRACTITIONER'S ADDRESS MAILING ADDRESS, PO BOX, OR NUMBER/STREET/SUITE#																							
S 8 5 5 S I L V E R C R E E K V A L L E Y P L A C E																							
CITY STATE ZIP OR POSTAL CODE COUNTRY (IF NOT U.S.A.)																							
S A N J O S E CA 9 5 1 3 8 USA																							
18. COUNTY HOSPITAL/GOVERNMENT FACILITY ADDRESS FACILITY NAME (IF APPLICABLE) as above																							
FACILITY ADDRESS, NUMBER/STREET/SUITE#																							
CITY STATE ZIP OR POSTAL CODE COUNTRY (IF NOT U.S.A.)																							
Physician/Practitioner's Certification:																							
I certify under penalty of perjury that the patient is unable to perform his/her regular or customary work because of the listed disabling condition(s). I have performed a physical examination and/or treated the patient. I am authorized to certify a patient disability or serious health condition pursuant to California Unemployment Insurance Code Section 2708.																							
19. PHYSICIAN/PRACTITIONER'S ORIGINAL SIGNATURE - RUBBER STAMP IS NOT ACCEPTABLE																							
SIGNATURE												DATE SIGNED						AREA CODE/PHONE NUMBER					
												0 9 / 2 0 / 2 0 2 3						6 5 0 4 9 3 5 0 0 4					
Under sections 2116 and 2122 of the California Unemployment Insurance Code, it is a violation for any individual who with intent to defraud, falsely certifies the medical condition of any person in order to obtain Disability Insurance benefits, whether for the maker or for any other person, and is punishable by imprisonment and/or a fine not exceeding \$20,000. Section 1143 requires additional administrative penalties.																							

Refill Request Form

NO REFILLS REMAINING.

AUSTIN ORLANDO DETAGLE
ESCITALOPRAM OXALATE 5MG TAB

Rx# 40574900C Provider: SMITH K.

Date: 05/21/2024

TAKE THREE TABLETS BY MOUTH EVERY MORNING TO IMPROVE MOOD.



640-17098137

SAN JOSE, CA
3801 MIRANDA AVE
PALO ALTO, CA 94304
(800) 311-2511

Qty: 90
NO COPAY
Last Fill Date: Feb 01, 2025

Fill: (4of4)
Days Supply: 30



40574900C

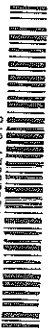
Refill Request Form

AUSTIN ORLANDO DETAGLE
ESCITALOPRAM OXALATE 20MG TAB

Fix# 40599999

Date: 05/23/2024

Provider: SMITH K.
TAKE ONE TABLET BY MOUTH EVERY MORNING TO IMPROVE MOOD.



640-1723554

SAN JOSE, CA
3801 MIRANDA AVE
PALO ALTO, CA 94304
(800) 311-2511

Qty: 90

Fill: (1of3)

NO COPAY

Days Supply: 90

Last Fill Date: May 23, 2025

2 REFILL(S) REMAINING BEFORE 5/23/2025



40599999

Sign Here to Order Refill:

Done

10:44 AM

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7 of 6

1. On June 13, 2011, the defendant told me, I had been called and
 2. told that a domestic dispute had taken place between Austin & I.
 3. I told the officers that Austin was with me, where in reality,
 4. I was the only one driving the shifting Austin kept
 5. asking me to get out of his car. I kept getting
 6. in and then yelling for him to get out his phone to record me.
 7. I tried to take his phone, he put it away I kept
 8. yelling, he kept telling me to please get out of his
 9. car. I have tried getting him with a metal water
 10. bottle, he had in the car. Austin then pulled out his
 11. phone to record, I tried to take it again, he took the
 12. water bottle from me. I then proceeded to punch him
 13. in the shoulder twice area. I was within when
 14. he ran out of the car to get away from me. I
 15. got out, he got back in his car. I left the scene
 16. because he remained calm, never raised our voices
 17. and me. I was the one instigating the problem.

Lawyaw Package ID: 48233882-445a-455a-9fca-c81089213a4a

1 Dennis R. Ingols, CSB #236458
2 The Law Office of Dennis R. Ingols
3 111 North Market Street, Suite 300
4 San Jose, CA 95113
5 (408)601-0126
6 dennis@ingolslaw.com

7 Attorney for Petitioner

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF SANTA CLARA**

10
11 ELIZABETH SANCHEZ,

12 Petitioner,

13 vs.

14 AUSTIN SANCHEZ DETAGLE,

15 Respondent.

Case No.: 19CP000822

DECLARATION OF DENNIS R. INGOLS

16 I, DENNIS R. INGOLS, declare:

17
18 . I am an attorney at law, duly licensed to practice in all state and federal courts in the State of
19 California. I am the attorney of record for Petitioner, Elizabeth Sanchez, and make this
20 declaration in that capacity

21
22 1. This declaration is filed in connection with Petitioner's motion to compel, and
23 for attorney's fees and sanctions related to Respondent's complete refusal to cooperate with
24 DECLARATION OF DENNIS R. INGOLS
25 SANCHEZ V. SANCHEZ DETAGLE
CASE NO.: 17CP000822

1 basic discovery requests.

2 2. Petitioner has had court-ordered sole physical and legal custody since February
3 2023. Petitioner was able to actually to take custody in April 2023, and has had 100% custody
4 ever since. The recent history in this case has been well documented and will not be repeated
5 herein, except insofar as it relates to retroactivity.

6 3. Naturally, I served Respondent with some basic discovery to explore
7 Respondent's income, his Good Cause Reports, and some information/documentation related
8 to his treatment for his mental health. Respondent has not provided any objections,
9 information or documents.

10 4. Normally, the law requires a "Separate Statement" in motions stemming from
11 discovery disputes. However, where, as here, "no response has been provided to the request
12 for discovery" such Separate Statement is not required. California Rule of Court 3.1345(b)
13

14 5.

15 6. Attached hereto as Exhibit A is a true and correct copy of Form Interrogatories,
16 Set Three, which was served by mail on Respondent on September 8, 2023. Interrogatories 1,
17 3, 4, 5, 6, 7, 8, 9, 10, 15, 16, 18, 19, and 20 were checked.

18 7. Attached hereto as Exhibit B is a true and correct copy of Request for
19 Production of Documents which was served by mail on Respondent on September 8, 2023.

20 8. Attached hereto as Exhibit C is a true and correct copy of the Proof of Service
21 by Mail of the discovery requests, which was served by mail on Respondent on September 8,
22 2023.

23
24 DECLARATION OF DENNIS R. INGOLS
25 SANCHEZ V. SANCHEZ DETAGLE
CASE NO.: 17CP000822

1 9. As the Court can see, I requested the following documents which are relevant to
2 child support and/or child custody and visitation:

3 **REQUEST FOR PRODUCTION #1:**

4 All bank statements for the period of January 1, 2022, through the date of production for any
5 accounts in YOUR name, whether solely or held joint with others.

6 **REQUEST FOR PRODUCTION #2:**

7 All statements for any smart phone cash applications in YOUR name, including but not
8 limited to PayPal, Venmo, Cash App, etc., for the period of January 1, 2022, through the date
9 of production.

10 **REQUEST FOR PRODUCTION #3:**

11 All W-2 and 1099 forms reflecting income earned by YOU for the period of January 1, 2022,
12 through the date of production.

13 **REQUEST FOR PRODUCTION #4:**

14 All federal tax returns filed by YOU for tax years 2021 through 2022.

15 **REQUEST FOR PRODUCTION #5:**

16 All documents showing any medical diagnosis for any current conditions YOU have.

17 **REQUEST FOR PRODUCTION #6:**

18 All documents showing any and all medications that are currently taking, including
19 prescription and over-the-counter medication, the dosages, and the medical provider that
20 prescribed them.

21 **REQUEST FOR PRODUCTION #7:**

22 All credit card statements for the period of January 1, 2022, through the date of production for
23 any accounts in YOUR name, whether solely or held joint with others.

24 **REQUEST FOR PRODUCTION #8:**

25 Any audio and/or video recordings YOU have of Petitioner or her attorney for the period of
January 1, 2022, through the date of production.

//

DECLARATION OF DENNIS R. INGOLS
SANCHEZ V. SANCHEZ DETAGLE
CASE NO.: 17CP000822

REQUEST FOR PRODUCTION #9:

Any evidence you intend to present to the Court in this case.

REQUEST FOR PRODUCTION #10:

All Good Cause Reports filed by YOU for the period of January 1, 2022, through the present.

REQUEST FOR PRODUCTION #11:

Any audio and/or video recordings YOU have of any court proceedings for the period of January 1, 2022, through the date of production.

10. Petitioner asks that the Court order attorney's fees payable by Petitioner, based on Respondent's misuse and/or abuse of the discovery process. CCP §2023.010, *et seq.*

11. I was retained by Petitioner at the discounted rate of \$250 per hour. That hourly rate reflected a discount from my standard rate at the time I was retained. Further, I have not increased that rate in all the years that I have represented Petitioner. For reference, my current hourly rate for new clients is \$450. I have worked in family law in Santa Clara County since 2005.

12. I estimate that I will spend at least 5-10 hours total in preparing this declaration, filing and serving the motion, preparing for and attending the hearing, and otherwise working to obtain Respondent's basic financials. As the requested information and documents are routine, and Respondent's complete refusal to respond without any explanation are a clear abuse of the discovery process, I respectfully request the Court sanction Respondent in the amount of \$2,500, representing 10 hours of my time.

I declare and affirm under penalty of perjury under the laws of the State of California

//

DECLARATION OF DENNIS R. INGOLS
SANCHEZ V. SANCHEZ DETAGLE
CASE NO.: 17CP000822

Lawyaw Package ID: 48233882-445a-455a-9fca-c81089213a4a

1 that the foregoing is true and correct, except as to those matters which are stated on
2 information and belief, and I am informed and believe those matters to be true and correct.
3

4 Date: October 14, 2023

Dennis R. Ingols
DENNIS R. INGOLS, ESQ.

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24 DECLARATION OF DENNIS R. INGOLS
25 SANCHEZ V. SANCHEZ DETAGLE
CASE NO.: 17CP000822

Lawyaw Package ID: 48233882-445a-455a-9fca-c81089213a4a

EXHIBIT A

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Dennis R. Ingols 236458 Law Office of Dennis R. Ingols 111 N. Market Street, #300 San Jose CA 95113		TELEPHONE NO.: (408)601-0126
ATTORNEY FOR (Name): Elizabeth Sanchez		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Santa Clara		
SHORT TITLE: Sanchez v. Detagle		
FORM INTERROGATORIES—FAMILY LAW Asking Party: Elizabeth Sanchez Answering Party: Austin Orlando Sanchez Detagle Set No.: 1		CASE NUMBER: 17-CP-000822

Sec. 1. Instructions to Both Parties

The interrogatories on page 2 of this form are intended to provide for the exchange of relevant information without unreasonable expense to the answering party. They do not change existing law relating to interrogatories, nor do they affect the answering party's right to assert any privilege or make any objection. Privileges must be asserted.

Sec. 2. Definitions

Words in **boldface** in these interrogatories are defined as follows:

- (a) **Person** includes a natural person; a partnership; any kind of business, legal, or public entity; and its agents or employees.
- (b) **Document** means all written, recorded, or graphic materials, however stored, produced, or reproduced.
- (c) **Asset or property** includes any interest in real estate or personal property. It includes any interest in a pension, profit-sharing, or retirement plan.
- (d) **Debt** means any obligation, including debts paid since the date of separation.
- (e) **Support** means any benefit or economic contribution to the living expenses of another person, including gifts.
- (f) If asked to **identify a person**, give the person's name, last known residence and business addresses, telephone numbers, and company affiliation at the date of the transaction referred to.
- (g) If asked to **identify a document**, attach a copy of the document unless you explain why not. If you do not attach the copy, describe the document, including its date and nature, and give the name, address, telephone number, and occupation of the person who has the document.

Sec. 3. Instructions to the Asking Party

Check the box next to each interrogatory you want the answering party to answer.

Sec. 4. Instructions to the Answering Party

You must answer these interrogatories under oath within 30 days, in accordance with Code of Civil Procedure section 2030.260.

You must furnish all information you have or can reasonably find out, including all information (not privileged) from your attorneys or under your control. If you don't know, say so.

If an interrogatory is answered by referring to a document, the document must be attached as an exhibit to the response and referred to in the response. If the document has more than one page, refer to the page and section where the answer can be found.

If a document to be attached to the response may also be attached to the *Schedule of Assets and Debts* (form FL-142), the document should be attached only to the response, and the form should refer to the response.

If an interrogatory cannot be answered completely, answer as much as you can, state the reason you cannot answer the rest, and state any information you have about the unanswered portion.

Sec. 5. Oath

Your answers to these interrogatories must be under oath, dated, and signed. Use the following statement at the end of your answers:

I declare under penalty of perjury under the laws of the State of California that the foregoing answers are true and correct.

(DATE)

(SIGNATURE)

- ☒ 1. **Personal history.** State your full name, current residence address and work address, social security number, any other names you have used, and the dates between which you used each name.
- ☐ 2. **Agreements.** Are there any agreements between you and your spouse or domestic partner, made before or during your marriage or domestic partnership or after your separation, that affect the disposition of assets, debts, or support in this proceeding? If your answer is yes, for each agreement state the date made and whether it was written or oral, and attach a copy of the agreement or describe its contents.
- ☒ 3. **Legal actions.** Are you a party or do you anticipate being a party to any legal or administrative proceeding other than this action? If your answer is yes, state your role and the name, jurisdiction, case number, and a brief description of each proceeding.
- ☒ 4. **Persons sharing residence.** State the name, age, and relationship to you of each person at your present address.
- ☒ 5. **Support provided others.** State the name, age, address, and relationship to you of each person for whom you have provided support during the past 12 months and the amount provided per month for each.
- ☒ 6. **Support received for others.** State the name, age, address, and relationship to you of each person for whom you have received support during the past 12 months and the amount received per month for each.
- ☒ 7. **Current income.** List all income you received during the past 12 months, its source, the basis for its computation, and the total amount received from each. Attach your last three paycheck stubs.
- ☒ 8. **Other income.** During the past three years, have you received cash or other property from any source not identified in item 7? If so, list the source, the date, and the nature and value of the property.
- ☒ 9. **Tax returns.** Attach copies of all tax returns and tax schedules filed by or for you in any jurisdiction for the past three calendar years.
- ☒ 10. **Schedule of assets and debts.** Complete the *Schedule of Assets and Debts* (form FL-142) served with these interrogatories.
- ☐ 11. **Separate property contentions.** State the facts that support your contention that an asset or debt is separate property.
- ☐ 12. **Property valuations.** During the past 12 months, have you received written offers to purchase or had written appraisals of any of the assets listed on your completed *Schedule of Assets and Debts*? If your answer is yes, identify the document.
- ☐ 13. **Property held by others.** Is there any property held by any third party in which you have any interest or over which you have any control? If your answer is yes, indicate whether the property is shown on the *Schedule of Assets and Debts* completed by you. If it is not, describe and identify each such asset, state its present value and the basis for your valuation, and identify the person holding the asset.
- ☐ 14. **Retirement and other benefits.** Do you have an interest in any disability, retirement, profit-sharing, or deferred compensation plan? If your answer is yes, identify each plan and provide the name, address, and telephone number of the administrator and custodian of records.
- ☒ 15. **Claims of reimbursement.** Do you claim the legal right to be reimbursed for any expenditures of your separate or community property? If your answer is yes, state all supporting facts.
- ☒ 16. **Credits.** Have you claimed reimbursement credits for payments of community debts since the date of separation? If your answer is yes, identify the source of payment, the creditor, the date paid, and the amount paid. State whether you have added to the debt since the separation.
- ☐ 17. **Insurance.** Identify each health, life, automobile, and disability insurance policy or plan that you now own or that covers you, your children, or your assets. State the policy type, policy number, and name of the company. Identify the agent and give the address.
- ☒ 18. **Health.** Is there any physical or emotional condition that limits your ability to work? If your answer is yes, state each fact on which you base your answer.
- ☒ 19. **Children's needs.** Do you contend that any of your children have any special needs? If so, identify the child with the need, the reason for the need, its cost, and its expected duration.
- ☒ 20. **Attorney fees.** State the total amount of attorney fees and costs incurred by you in this proceeding, the amount paid, and the source of the money paid. Describe the billing arrangements.
- ☐ 21. **Gifts.** List any gifts you have made without the consent of your spouse or domestic partner in the past 24 months, their values, and the recipients.

Lawyaw Package ID: 48233882-445a-455a-9fca-c81089213a4a

THIS FORM SHOULD NOT BE FILED WITH THE COURT

FL-142

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address):	TELEPHONE NO.:
ATTORNEY FOR (Name):	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF	
PETITIONER:	
RESPONDENT:	
SCHEDULE OF ASSETS AND DEBTS <input type="checkbox"/> Petitioner's <input type="checkbox"/> Respondent's	CASE NUMBER:

— INSTRUCTIONS —

List all your known community and separate assets or debts. Include assets even if they are in the possession of another person, including your spouse. If you contend an asset or debt is separate, put P (for Petitioner) or R (for Respondent) in the first column (separate property) to indicate to whom you contend it belongs.

All values should be as of the date of signing the declaration unless you specify a different valuation date with the description. For additional space, use a continuation sheet numbered to show which item is being continued.

ITEM NO.	ASSETS DESCRIPTION	SEP. PROP.	DATE ACQUIRED	CURRENT GROSS FAIR MARKET VALUE	AMOUNT OF MONEY OWED OR ENCUMBRANCE
1.	REAL ESTATE (Give street addresses and attach copies of deeds with legal descriptions and latest lender's statement.)			\$	\$
2.	HOUSEHOLD FURNITURE, FURNISHINGS, APPLIANCES (Identify.)				
3.	JEWELRY, ANTIQUES, ART, COIN COLLECTIONS, etc. (Identify.)				

Lawyaw Package ID: 48233882-445a-455a-9fca-c81089213a4a

ITEM NO.	ASSETS DESCRIPTION	SEP. PROP.	DATE ACQUIRED	CURRENT GROSS FAIR MARKET VALUE	AMOUNT OF MONEY OWED OR ENCUMBRANCE
4.	VEHICLES, BOATS, TRAILERS <i>(Describe and attach copy of title document.)</i>			\$	\$
5.	SAVINGS ACCOUNTS <i>(Account name, account number, bank, and branch. Attach copy of latest statement.)</i>				
6.	CHECKING ACCOUNTS <i>(Account name and number, bank, and branch. Attach copy of latest statement.)</i>				
7.	CREDIT UNION, OTHER DEPOSIT ACCOUNTS <i>(Account name and number, bank, and branch. Attach copy of latest statement.)</i>				
8.	CASH <i>(Give location.)</i>				
9.	TAX REFUND				
10.	LIFE INSURANCE WITH CASH SURRENDER OR LOAN VALUE <i>(Attach copy of declaration page for each policy.)</i>				

Lawyaw Package ID: 48233882-445a-455a-9fca-c81089213a4a

ITEM NO.	ASSETS DESCRIPTION	SEP. PROP.	DATE ACQUIRED	CURRENT GROSS FAIR MARKET VALUE	AMOUNT OF MONEY OWED OR ENCUMBRANCE
11.	STOCKS, BONDS, SECURED NOTES, MUTUAL FUNDS (Give certificate number and attach copy of the certificate or copy of latest statement.)			\$	\$
12.	RETIREMENT AND PENSIONS (Attach copy of latest summary plan documents and latest benefit statement.)				
13.	PROFIT - SHARING, ANNUITIES, IRAS, DEFERRED COMPENSATION (Attach copy of latest statement.)				
14.	ACCOUNTS RECEIVABLE AND UNSECURED NOTES (Attach copy of each.)				
15.	PARTNERSHIPS AND OTHER BUSINESS INTERESTS (Attach copy of most current K-1 form and Schedule C.)				
16.	OTHER ASSETS				
17.	TOTAL ASSETS FROM CONTINUATION SHEET				
18.	TOTAL ASSETS			\$ 0.00	\$ 0.00

Lawyaw Package ID: 48233882-445a-455a-9fca-c81089213a4a

ITEM NO.	DEBTS—SHOW TO WHOM OWED	SEP. PROP.	TOTAL OWING	DATE INCURRED
19.	STUDENT LOANS <i>(Give details.)</i>		\$	
20.	TAXES <i>(Give details.)</i>			
21.	SUPPORT ARREARAGES <i>(Attach copies of orders and statements.)</i>			
22.	LOANS—UNSECURED <i>(Give bank name and loan number and attach copy of latest statement.)</i>			
23.	CREDIT CARDS <i>(Give creditor's name and address and the account number. Attach copy of latest statement.)</i>			
24.	OTHER DEBTS <i>(Specify):</i>			
25.	TOTAL DEBTS FROM CONTINUATION SHEET			
26.	TOTAL DEBTS		\$ 0.00	

27. ☐ (Specify number): _____ pages are attached as continuation sheets.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(TYPE OR PRINT NAME)

(SIGNATURE OF DECLARANT)

Lawyaw Package ID: 48233882-445a-455a-9fca-c81089213a4a

EXHIBIT B

1 Dennis R. Ingols, CSB #236458
2 The Law Office of Dennis R. Ingols
3 111 North Market Street, Suite 300
4 San Jose, CA 95113
(408)601-0126
dennis@ingolslaw.com

5 Attorney for Petitioner

6
7
8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF SANTA CLARA**
10

11 **ELIZABETH SANCHEZ**

Case No.: 17CP000822

12
13 **Petitioner,**

14 **vs.**

**REQUEST FOR PRODUCTION OF
DOCUMENTS**

15 **AUSTIN SANCHEZ DE TAGLE,**

16 **Respondent.**
17
18

19 **PROPOUNDING PARTY: ELIZABETH SANCHEZ**

20 **RESPONDING PARTY: AUSTIN SANCHEZ DE TAGLE**

21 **SET NUMBER: ONE**

22 **DEMAND IS HEREBY MADE** pursuant to Code of Civil Procedure Section 2031, et.
23 seq., that you produce and permit inspection and copying of documents described below at the
24 Law Office of Dennis R. Ingols, 111 North First Street, #300, San Jose, CA 95113, within 30
25 days of the date of service. You are required to serve a written response, under oath,

REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE
17CP000822

1 responding to each item or category as provided in Code of Civil Procedure Section 2031. A
2 written response shall be served within thirty (30) days of the service of this request.
3 Propounding party further requests that if no document is in your possession, custody, or
4 control, you state whether it is lost, destroyed or otherwise disposed of and describe the
5 circumstances of such disposition.

6 In lieu of personal appearance and production on the above date, compliance with this
7 Request for Production of Documents and Things may be accomplished by mailing on or
8 before the production date to counsel at the above address, full, true, and correct copies of the
9 requested documents and things, verified by you as such, in a manner prescribed for written
10 response to the demand for inspection of documents pursuant to Code of Civil Procedure
11 Section 2031 *et seq.*
12

13 **DEFINITIONS**

14 1. YOU or YOUR as used herein mean the Responding Party, and any person acting on
15 his or her behalf, including but not limited to the action of your agents, your employees, your
16 insurance companies, their agents, their employees, your attorneys, your accountants, your
17 investigators, and anyone else acting on your behalf.
18

19 2. DOCUMENT as used herein means any evidence or writing as Defined by Evidence
20 Code Sections 140 and 250, and includes the original or a copy of handwriting, typewriting,
21 printing, photostatic, photographing, and any other means of recording including audio and
22 video, upon any tangible thing and form of communicating or representation, including
23 letters, words, pictures, sounds, symbols, or combination thereof. This definition specifically
24 includes, but is not limited to, bank statements, monthly, quarterly, semi-annual or annual
25 account statements from any financial institution, canceled checks, deposit slips, computer

1 printouts, written summaries, credit applications, deeds of trust, promissory notes, credit card
2 statements, property tax bills, mortgage agreements, lease and/or rental agreements.

3 3. PERSON as used herein means any natural person, firm, association, organization,
4 partnership, business, trust, corporation, company, or public entity.

5 4. IDENTIFY as used herein, if used in relationship to a PERSON or an entity, means
6 IDENTIFY by name, address, and telephone number of that PERSON or entity, but if the
7 name, address, or telephone number of that PERSON is not known, IDENTIFY means to set
8 forth all descriptive characteristics and facts with regard to such PERSON such as estimated
9 age, height, hair color, eye color, tattoos, etc.

10 5. PROPERTY as used herein means anything that is owned by and PERSON or ENTITY.
11 This includes both real and personal, tangible and intellectual. Real property includes any
12 interest in land, real estate, or any improvements thereon. Personal property includes money,
13 goods, chattels and evidences of debt.
14

15 **REQUESTS FOR PRODUCTION**

16 **REQUEST FOR PRODUCTION #1:**

17 All bank statements for the period of January 1, 2022, through the date of production for any
18 accounts in YOUR name, whether solely or held joint with others.

19 **REQUEST FOR PRODUCTION #2:**

20 All statements for any smart phone cash applications in YOUR name, including but not
21 limited to PayPal, Venmo, Cash App, etc., for the period of January 1, 2022, through the date
22 of production.

23 **REQUEST FOR PRODUCTION #3:**

24 All W-2 and 1099 forms reflecting income earned by YOU for the period of January 1, 2022,
25 through the date of production.

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REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE
17CP000822

REQUEST FOR PRODUCTION #4:

All federal tax returns filed by YOU for tax years 2021 through 2022.

REQUEST FOR PRODUCTION #5:

All documents showing any medical diagnosis for any current conditions YOU have.

REQUEST FOR PRODUCTION #6:

All documents showing any and all medications that are currently taking, including prescription and over-the-counter medication, the dosages, and the medical provider that prescribed them.

REQUEST FOR PRODUCTION #7:

All credit card statements for the period of January 1, 2022, through the date of production for any accounts in YOUR name, whether solely or held joint with others.

REQUEST FOR PRODUCTION #8:

Any audio and/or video recordings YOU have of Petitioner or her attorney for the period of January 1, 2022, through the date of production.

REQUEST FOR PRODUCTION #9:

Any evidence you intend to present to the Court in this case.

REQUEST FOR PRODUCTION #10:

All Good Cause Reports filed by YOU for the period of January 1, 2022, through the present.

REQUEST FOR PRODUCTION #11:

Any audio and/or video recordings YOU have of any court proceedings for the period of January 1, 2022, through the date of production.

DATED: September 8, 2023


DENNIS R. INGOLS, ESQ.
Attorney for Petitioner

Lawyaw Package ID: e499d8a3-a7ec-41ea-9312-fdefe55eab35
 17CP000822
 Santa Clara - Family

FL-410

ATTORNEY OR PARTY WITHOUT ATTORNEY (name, State Bar number, and address): Dennis R. Ingols 236458 Law Office of Dennis R. Ingols 111 N. Market Street, #300 San Jose CA 95113 TELEPHONE NO.: (408)601-0126 FAX NO. (optional): E-MAIL ADDRESS (optional): dennis@ingolslaw.com ATTORNEY FOR (name): Elizabeth Sanchez		FOR COURT USE ONLY Electronically filed by Superior Court of CA, County of Santa Clara, on 4/5/2024 7:23 PM Reviewed By: S. Prasad Case #17CP000822 Env. #14984576
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Santa Clara STREET ADDRESS: 201 N. First Street MAILING ADDRESS: 191 N. First Street CITY AND ZIP CODE: San Jose 95113 BRANCH NAME: Family Justice Center Courthouse		
PETITIONER/PLAINTIFF: Elizabeth Sanchez RESPONDENT/DEFENDANT: Austin Sanchez de Tagle OTHER PARTY/PARENT:		
ORDER TO SHOW CAUSE AND AFFIDAVIT FOR CONTEMPT		CASE NUMBER: 17CP000822
NOTICE! A contempt proceeding is criminal in nature. If the court finds you in contempt, the possible penalties include jail sentence, community service, and fine. You are entitled to the services of an attorney, who should be consulted promptly in order to assist you. If you cannot afford an attorney, the court may appoint an attorney to represent you.		¡AVISO! Un proceso judicial por desacato es de índole criminal. Si la corte le declara a usted en desacato, las sanciones posibles incluyen penas de prisión y de servicio a la comunidad, y multas. Usted tiene derecho a los servicios de un abogado, a quien debe consultar sin demora para obtener ayuda. Si no puede pagar a un abogado, la corte podrá nombrar a un abogado para que le represente.

1. TO CITEE (name of person you allege has violated the orders): Austin Sanchez de Tagle
2. YOU ARE ORDERED TO APPEAR IN THIS COURT AS FOLLOWS, TO GIVE ANY LEGAL REASON WHY THIS COURT SHOULD NOT FIND YOU GUILTY OF CONTEMPT, PUNISH YOU FOR WILLFULLY DISOBEYING ITS ORDERS AS SET FORTH IN THE AFFIDAVIT BELOW AND ANY ATTACHED AFFIDAVIT OF FACTS CONSTITUTING CONTEMPT; AND REQUIRE YOU TO PAY, FOR THE BENEFIT OF THE MOVING PARTY, THE ATTORNEY FEES AND COSTS OF THIS PROCEEDING.

a. Date:	05/20/2024	Time:	1:30PM	Dept.:	65	Rm.:	
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b. Address of court: ☐ same as noted above ☐ other (specify):

Date: 4/5/2024 7:23 PM

 AD
 Hon. Brooke Blecher
 JUDICIAL OFFICER

AFFIDAVIT SUPPORTING ORDER TO SHOW CAUSE FOR CONTEMPT

3. ☒ An Affidavit of Facts Constituting Contempt (form FL-411 or FL-412) is attached.
4. Citee has willfully disobeyed certain orders of this court as set forth in this affidavit and any attached affidavits.
5. a. Citee had knowledge of the order in that
- (1) ☒ citee was present in court at the time the order was made.
 - (2) ☐ citee was served with a copy of the order.
 - (3) ☐ citee signed a stipulation upon which the order was based.
 - (4) ☐ other (specify):
- ☐ Continued on Attachment 5a(4).
- b. Citee was able to comply with each order when it was disobeyed.
6. Based on the instances of disobedience described in this affidavit
- a. ☒ I have not previously filed a request with the court that the citee be held in contempt.
 - b. ☐ I have previously filed a request with the court that the citee be held in contempt (specify date filed and results):

☐ Continued on Attachment 6b.

PETITIONER/PLAINTIFF: Elizabeth Sanchez	CASE NUMBER:
RESPONDENT/DEFENDANT: Austin Sanchez de Tagle	17CP000822
OTHER PARENT:	

AFFIDAVIT OF FACTS CONSTITUTING CONTEMPT
Financial and Injunctive Orders

Attachment to Order to Show Cause and Affidavit for Contempt (form FL-410)

1. a. Orders for child support, spousal support, family support, attorney fees, and court and litigation costs (*separately itemize each default on installment payments*):

DATE DUE	TYPE OF ORDER AND DATE FILED	PAYABLE TO	AMOUNT ORDERED	AMOUNT PAID	AMOUNT DUE
12/15/2023	Child Support - 1/25/2024	Elizabeth Sanchez	2011	0	2011
1/15/2024	Child Support - 1/25/2024	Elizabeth Sanchez	2011	0	2011
2/15/2024	Child Support - 1/25/2024	Elizabeth Sanchez	2011	0	2011
3/15/2024	Child Support - 1/25/2024	Elizabeth Sanchez	2011	0	2011
3/7/2024	Attorney's Fees - 1/25/2024	Elizabeth Sanchez	1500	0	1500
6/4/2023	Attorney's Fees - 1/25/2024	Elizabeth Sanchez	2500	1000	1500
<input type="checkbox"/> Continued on Attachment 1a.			TOTAL AMOUNT ORDERED	TOTAL AMOUNT PAID	TOTAL AMOUNT DUE
Summary of contempt counts alleged (including all attachments): Child support: 4 counts of \$2011 Spousal support: Family support: Attorney fees: 2 counts. \$2,500 plus \$1,500 Court and other costs:			8022	0	8022
			4000	1000	3000
			\$ 12022	\$ 1000	\$ 11022
Total					

- b. ☐ Other orders (*specify which order was violated, how the order was violated, and when the violation occurred*):

☐ Continued on Attachment 1b.

- c. ☐ Other material facts (*specify*):

☐ Continued on Attachment 1c.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 04/05/2024

Elizabeth Sanchez

(TYPE OR PRINT NAME)

► Elizabeth Sanchez

(SIGNATURE)

Page 1 of 1

Lawyaw Package ID: e499d8a3-a7ec-41ea-9312-fdefe55eab35
 Santa Clara - Family

FL-410

ATTORNEY OR PARTY WITHOUT ATTORNEY (name, State Bar number, and address): Dennis R. Ingols 236458 Law Office of Dennis R. Ingols 111 N. Market Street, #300 San Jose CA 95113 TELEPHONE NO.: (408)601-0126 FAX NO. (optional): E-MAIL ADDRESS (optional): dennis@ingolslaw.com ATTORNEY FOR (name): Elizabeth Sanchez		FOR COURT USE ONLY Electronically filed by Superior Court of CA, County of Santa Clara, on 4/5/2024 7:23 PM Reviewed By: S. Prasad Case #17CP000822 Env. #14984576
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a. Date:	05/20/2024	Time:	1:30PM	Dept.:	65	Rm.:	
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b. Address of court: ☐ same as noted above ☐ other (specify):

Date: 4/5/2024 7:23 PM


 Hon. Brooke Blecher
 JUDICIAL OFFICER

AFFIDAVIT SUPPORTING ORDER TO SHOW CAUSE FOR CONTEMPT

3. ☒ An Affidavit of Facts Constituting Contempt (form FL-411 or FL-412) is attached.
4. Citee has willfully disobeyed certain orders of this court as set forth in this affidavit and any attached affidavits.
5. a. Citee had knowledge of the order in that
- (1) ☒ citee was present in court at the time the order was made.
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 - (3) ☐ citee signed a stipulation upon which the order was based.
 - (4) ☐ other (specify):
- ☐ Continued on Attachment 5a(4).
- b. Citee was able to comply with each order when it was disobeyed.
6. Based on the instances of disobedience described in this affidavit
- a. ☒ I have not previously filed a request with the court that the citee be held in contempt.
 - b. ☐ I have previously filed a request with the court that the citee be held in contempt (specify date filed and results):

☐ Continued on Attachment 6b.

Page 1 of 4

22 of 62

Update

Inbox x

**Dennis Ingols** <dennis@ingolslaw.com>

to me ▾

Mr. De Tagle,

I haven't heard from you in a while, and I hope you are doing well.

You missed court on Monday morning, and again this afternoon.

I also write to inquire about your compliance with the Court's orders regarding discovery and payment of attorney's fees. When can I expect to receive your documents? Your payments?

Thank you,

Dennis R. Ingols, Esq.

Pronouns: he/him

Wed, Feb 28, 1:49 PM (5 days ago)



DEPARTMENT OF VETERANS AFFAIRS
PALO ALTO HEALTH CARE SYSTEM (VAPAHCS)
San Jose VA Clinic
5855 Silver Creek Valley Place
San Jose, CA 95138

9/20/2023

To Whom It May Concern:

AUSTIN ORLANDO DETAGLE (DOB 3/6/1986) has been under my care since 3/22/2023

Our records suggest he has been improving in his condition over the last 6 months

Sincerely

Shaili Jain
Shaili Jain, M.D

120

4/5/24, 9:28 AM

Gmail - Update Regarding Attorney's Fees



Austin de Tagle <sonoftagle@gmail.com>

Update Regarding Attorney's Fees

Dennis Ingols <dennis@ingolslaw.com>
To: Austin de Tagle <sonoftagle@gmail.com>

Thu, Mar 28, 2024 at 7:45 PM

Mr. De Tagle,

Once again, your reading comprehension is lacking. I offered you a *discount*.

Contempt of court will likely be my next step.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él



(408) 601-0126
111 North Market Street, Suite #300
San José, CA 95113
www.ingolslaw.com

This e-mail message and any attachments are confidential and may be attorney-client privileged. If you are not the intended recipient, please notify The Law Office of Dennis R. Ingols immediately by telephone at (408)601-0126 and email at admin@ingolslaw.com. Please destroy all copies of this message and any attachments immediately.

[Quoted text hidden]

4/5/24, 9:28 AM

Gmail - Update Regarding Attorney's Fees



Austin de Tagle <sonoftagle@gmail.com>

Update Regarding Attorney's Fees

Austin de Tagle <sonoftagle@gmail.com>
To: Dennis Ingols <dennis@ingolslaw.com>

Thu, Mar 28, 2024 at 7:32 PM

Mr. Ingols,
what are you gonna do about it if I don't pay you by the end of march? that's only for a few days..... is that supposed to be threatening?

On Tue, Mar 19, 2024 at 12:24 PM Dennis Ingols <dennis@ingolslaw.com> wrote:
[Quoted text hidden]

4/5/24, 9:29 AM

Gmail - Update Regarding Attorney's Fees



Austin de Tagle <sonoftagle@gmail.com>

Update Regarding Attorney's Fees

Austin de Tagle <sonoftagle@gmail.com>
To: Dennis Ingols <dennis@ingolslaw.com>

Thu, Mar 28, 2024 at 1:41 PM

Mr, Ingols,
Stop harassing me I still have to notify the Bar Association of your poor behavior
[Quoted text hidden]

4/5/24, 9:30 AM

Gmail - Update Regarding Attorney's Fees



Austin de Tagle <sonoftagle@gmail.com>

Update Regarding Attorney's Fees

Dennis Ingols <dennis@ingolslaw.com>
To: Austin de Tagle <sonoftagle@gmail.com>

Thu, Mar 28, 2024 at 10:46 AM

Mr. De Tagle,

That's precisely the problem. I am the winner, and I'm not filing anything in the Supreme Court.

You lost, and you keep losing. You filed in the Supreme Court, twice, and it was rejected both times.

You've filed twice against Judge Estremera. You already lost the first, and you will lose the second next week.

You've filed against Judge Hendrickson, and you lost.

I promise you will never have a court date with the Supreme Court of California. You will never have a court date with the Supreme Court of the United States, either. Not for any case against me, not for any case against Elizabeth, not for any case against any judge. Never.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él



(408) 601-0126
111 North Market Street, Suite #300
San José, CA 95113
www.ingolslaw.com

This e-mail message and any attachments are confidential and may be attorney-client privileged. If you are not the intended recipient, please notify The Law Office of Dennis R. Ingols Immediately by telephone at (408)601-0126 and email at admin@ingolslaw.com. Please destroy all copies of this message and any attachments immediately.

[Quoted text hidden]

4/5/24, 9:30 AM

Gmail - Update Regarding Attorney's Fees



Austin de Tagle <sonoftagle@gmail.com>

Update Regarding Attorney's Fees

Thu, Mar 28, 2024 at 10:29 AM

Dennis Ingols <dennis@ingolslaw.com>
To: Austin de Tagle <sonoftagle@gmail.com>

Mr. De Tagle,

With all due respect, I humbly suggest you take a remedial reading class because you seem not to grasp what has already happened, even though I've explained it to you in writing, even though I've sent you the court orders.

Your restraining order case against me was dismissed, with prejudice. There are no more hearings on calendar and there won't be. It's over. See attached.

Your civil complaint case against me (23CV425839) was stricken, pursuant to CCP 425.16. The court may schedule another hearing on my request for fees, or it may address that issue on April 30, 2024. However, the simple fact of the matter is that you already lost. See attached.

Please, show me where in the ADA, or any of the caselaw applying the ADA, does it say that you do not have to comply with court orders.

If 'crying is all I'm good at' as you say, then why do I keep winning and you keep losing? Give up, get help, and focus your efforts on re-establishing visitation with your children.

Despite your repeated insults, I will still offer you a discount on \$7,600 plus interest that you owe me:

- Family Court Order from last April of \$2,500, minus \$1,000 that you paid;
- Family Court Order from last December of \$2,500, of which you have paid \$0;
- The Order for \$3,600 from your failed case against Elizabeth;
- Plus 10% interest per annum by statute.
- Pay me by the end of March and I will accept \$6,000 in total. This offer expires March 31, 2024, at which point I will take further legal collection measures.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él



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4/5/24, 9:30 AM

Gmail - Update Regarding Attorney's Fees



Austin de Tagle <sonoftagle@gmail.com>

Update Regarding Attorney's Fees

Thu, Mar 28, 2024 at 9:38 AM

Austin de Tagle <sonoftagle@gmail.com>

To: Dennis Ingols <dennis@ingolslaw.com>

Mr. Ingols,

It's interesting how you file all these motions prior to my case against you being heard, well it's a good thing it won't be vacated. All judges in the United States have a mission statement and that is to follow the constitution of California and the constitution of the United States. You can cry cry cry all you want. That is all you're good at, we have court next month Mr, Ingols you're not off the hook, you think you and your client are going to perjury and use prepared false evidence in family court matters and get away with it? You're a lawyer, but again you said the supreme court case was dismissed? You're a moron, stop harassing me. I told you I was filing a restraining order against you. I have a lot of protection as a veteran especially with the American Disabilities Act. It's okay to address this in the future. On the back of my disabilities sheet where it says something to the effects of "on going court hearings" the fact that you go out of your way to lie continue to file court hearings, and you do our best to "intimidate" me let me say that again your best to "intimidate me" lacking the knowledge of the ADA shows your malicious motives, attorneys do not behave like that. You are the defendant in two cases you have no need to contact me. You will never get a single dollar from me no matter what the judges order says, it's a good thing I have the right to a fair hearing :) I don't think any judge wants to get into trouble by not following their mission statement, the judicial system is just a state funded governmental program nothing special

[Quoted text hidden]



civil rights cover sheet.pdf

217K

4/5/24, 9:31 AM

Gmail - Update Regarding Attorney's Fees



Austin de Tagle <sonoftagle@gmail.com>

Update Regarding Attorney's Fees

Dennis Ingols <dennis@ingolslaw.com>
To: Austin de Tagle <sonoftagle@gmail.com>

Wed, Mar 27, 2024 at 1:10 PM

No what?

Dennis R. Ingols, Esq.

Pronouns: he/him/él



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111 North Market Street, Suite #300
San José, CA 95113
www.ingolslaw.com

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[Quoted text hidden]

4/5/24, 9:31 AM

Gmail - Update Regarding Attorney's Fees



Austin de Tagle <sonoftagle@gmail.com>

Update Regarding Attorney's Fees

Mon, Mar 25, 2024 at 7:56 PM

Dennis Ingols <dennis@ingolslaw.com>
To: Austin de Tagle <sonoftagle@gmail.com>

Mr. De Tagle,

Please explain to me what the attachment means, since you seem to believe that I can't comprehend it myself.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él



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111 North Market Street, Suite #300
San José, CA 95113
www.ingolslaw.com

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[Quoted text hidden]

Cert Denied ASDT v ES.pdf
12K

4/5/24, 9:31 AM

Gmail - Update Regarding Attorney's Fees



Austin de Tagle <sonoftagle@gmail.com>

Update Regarding Attorney's Fees

Dennis Ingols <dennis@ingolslaw.com>
To: Austin de Tagle <sonoftagle@gmail.com>

Mon, Mar 25, 2024 at 9:32 AM

Mr. De Tagle,

What do you mean I "didn't pay attention to what was served on [me]"? So far, everything you've served in the last year has been unsuccessful, and I've won every time.

What do you mean "good luck in the Supreme Court of California"? Your Petition for Certiorari was denied, just like your first one.

Your case against Judge Estremera was dismissed. How did that "make him understand?"

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él



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www.ingolslaw.com

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[Quoted text hidden]

4/5/24, 9:31 AM

Gmail - Update Regarding Attorney's Fees



Austin de Tagle <sonoftagle@gmail.com>

Update Regarding Attorney's Fees

Sun, Mar 24, 2024 at 8:40 PM

Dennis Ingols <dennis@ingolslaw.com>
To: Austin de Tagle <sonoftagle@gmail.com>

Mr. De Tagle,

The ADA doesn't mean what you think it means.

"Judge Joanna," as you call Commissioner Johanna Thai Van Dat, dismissed your case.

Judge Manoukian declared you to be a vexatious litigant and dismissed your case. A request for fees and sanctions is pending. Your response is due.

Judge Rosen dismissed your case against Elizabeth and ordered you to pay.

Judge Hendrickson ordered you to pay sanctions and child support.

Judge Estremera ordered you to pay sanctions.

Your case against Judge Estremera was dismissed by the Northern District. You re-filed it in state court, but that's about to be dismissed, too, along with your claims against Cara Olney and Judge Towery.

Your case against Judge Hendrickson was dismissed by the Northern District.

So far, you've lost every single time you've tried. It's time that you gave up and paid up.

Also, DCSS should be garnishing your checks soon.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él



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111 North Market Street, Suite #300
San José, CA 95113
www.ingolslaw.com

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4/5/24, 9:31 AM

Gmail - Update Regarding Attorney's Fees



Austin de Tagle <sonoftagle@gmail.com>

Update Regarding Attorney's Fees

Sun, Mar 24, 2024 at 8:11 PM

Austin de Tagle <sonoftagle@gmail.com>
To: Dennis Ingols <dennis@ingolslaw.com>

Stop harassing me and I was not served anything so I have no idea what you're talking about, be sure to properly serve me Mr. Ingols either way your not getting paid just like Judge Joanna did to your slapp. You have bigger things to worry about like me asking for you and Elizabeth's prosecution for preparing false evidence and perjury. I have the right to be hear and the right to a trial but seems like your unaware of these things. Any how stop harassing me your obsessed with me it's a little weird Mr. Ingols. Take up with the Judge not me dummy

[Quoted text hidden]

4/5/24, 9:32 AM

Gmail - Update Regarding Attorney's Fees



Austin de Tagle <sonoftagle@gmail.com>

Update Regarding Attorney's Fees

Sun, Mar 24, 2024 at 7:03 PM

Dennis Ingols <dennis@ingolslaw.com>
To: Austin de Tagle <sonoftagle@gmail.com>

Will that be cash, check, charge, or contempt of court?

Dennis R. Ingols, Esq.

Pronouns: he/him/él



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111 North Market Street, Suite #300
San José, CA 95113
www.ingolslaw.com

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[Quoted text hidden]

4/5/24, 9:32 AM

Gmail - Update Regarding Attorney's Fees



Austin de Tagle <sonoftagle@gmail.com>

Update Regarding Attorney's Fees

Fri, Mar 22, 2024 at 12:22 PM

Dennis Ingols <dennis@ingolslaw.com>
To: Austin de Tagle <sonoftagle@gmail.com>

Mr. De Tagle,

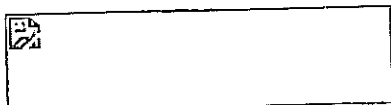
Thank you for acknowledging that I am a good family lawyer. I also have extensive experience in 42 U.S.C. 1983 litigation, specifically for the deprivation of the Constitutional rights to familiar association, as I've told you before. You can confirm as much on PACER.

Attached please find the Supreme Court's letter, dated March 20, 2024, denying your Petition for Certiorari in your case against Elizabeth. More are coming, I promise.

Have a nice weekend,

Dennis R. Ingols, Esq.

Pronouns: he/him/él



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[Quoted text hidden]

Cert Denied ASDT v ES.pdf
12K

4/5/24, 9:32 AM

Gmail - Update Regarding Attorney's Fees



Austin de Tagle <sonoftagle@gmail.com>

Update Regarding Attorney's Fees

Fri, Mar 22, 2024 at 9:04 AM

Dennis Ingols <dennis@ingolslaw.com>
 To: Austin de Tagle <sonoftagle@gmail.com>

Mr. De Tagle,

Your matter against me was heard. You lost. See attached.

Your matter against Elizabeth was heard. You lost. See attached.

Please tell me when, one single time, that you were denied your right to a hearing? If you skip court, or walk out in the middle of a hearing, that doesn't mean you were denied your right to a hearing. You do understand that, don't you?

You now owe me \$6,600 plus interest. Pay by the end of the month and I'll give you 10% off and waive the interest. This discount only applies to the attorney's fees you owe, not the child support that you owe, or the interest on the child support.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él



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[Quoted text hidden]

2 attachments

MO striking case.pdf
 105K

Order Re Dismissal.pdf
 667K

4/5/24, 9:33 AM

Gmail - Update Regarding Attorney's Fees



Austin de Tagle <sonoftagle@gmail.com>

Update Regarding Attorney's Fees

Wed, Mar 20, 2024 at 7:33 PM

Dennis Ingols <dennis@ingolslaw.com>
To: Austin de Tagle <sonoftagle@gmail.com>

Mr. De Tagle,

Please provide evidence for your claim that I "pay judges."

Please provide evidence for your claim that my ex-wife is now Judge Estremera's wife.

Did Oprah tell you these things?

Your myriad Supreme Court cases will not be heard. They will be summarily rejected, just like your first one was.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él



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111 North Market Street, Suite #300
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[Quoted text hidden]

4/5/24, 9:33 AM

Gmail - Update Regarding Attorney's Fees



Austin de Tagle <sonoftagle@gmail.com>

Update Regarding Attorney's Fees

Wed, Mar 20, 2024 at 6:15 PM

Dennis Ingols <dennis@ingolslaw.com>
To: Austin de Tagle <sonoftagle@gmail.com>

No, email works for me.

Please send payment.
[Quoted text hidden]

4/5/24, 9:33 AM

Gmail - Update Regarding Attorney's Fees



Austin de Tagle <sonoftagle@gmail.com>

Update Regarding Attorney's Fees

Wed, Mar 20, 2024 at 5:45 PM

Austin de Tagle <sonoftagle@gmail.com>
To: Dennis Ingols <dennis@ingolslaw.com>

Mr. Ingols,
Can you start mailing me those documents? There is no need for you to email me anything, I will have my day in court with you and Elizabeth to show the Judge the evidence in my case. I truly give you credit for your efforts, but you're still harassing me and using intimidation tactics, I truly fear for my life with you and I am scared of you and what your so capable of, hopefully this restraining order is granted against you. I won't be opening your emails so just mail me every document, you committed enough perjury and submitted plenty of false evidence.....
[Quoted text hidden]

4/5/24, 9:34 AM

Gmail - Update Regarding Attorney's Fees



Austin de Tagle <sonoftagle@gmail.com>

Update Regarding Attorney's Fees

Wed, Mar 20, 2024 at 3:25 PM

Dennis Ingols <dennis@ingolslaw.com>
To: Austin de Tagle <sonoftagle@gmail.com>

Attached is a draft proposed order after hearing dismissing your case against Elizabeth which will be e-filed today.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él



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111 North Market Street, Suite #300
San José, CA 95113
www.ingolslaw.com

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[Quoted text hidden]

order.pdf
686K

4/5/24, 9:34 AM

Gmail - Update Regarding Attorney's Fees



Austin de Tagle <sonoftagle@gmail.com>

Update Regarding Attorney's Fees

Tue, Mar 19, 2024 at 4:51 PM

Dennis Ingols <dennis@ingolslaw.com>
To: Austin de Tagle <sonoftagle@gmail.com>

Mr. De Tagle,

Attached please find the Minute Order for today in your failed case against Elizabeth. Elizabeth won. You lost.

The court date on May 7 will be vacated.

Again, I beg of you, stop the lawsuits and get yourself into treatment. The lawsuits will not reunite you with your children. They will only separate you from your money, as the attorney's fees and sanctions against you continue to accumulate.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él



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111 North Market Street, Suite #300
San José, CA 95113
www.ingolslaw.com

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[Quoted text hidden]

MO 3.19.24.pdf
112K

4/5/24, 9:36 AM

Gmail - Update Regarding Attorney's Fees



Austin de Tagle <sonoftagle@gmail.com>

Update Regarding Attorney's Fees

Tue, Mar 19, 2024 at 3:11 PM

Dennis Ingols <dennis@ingolslaw.com>
To: Austin de Tagle <sonoftagle@gmail.com>

All of your Supreme Court cases will be rejected.

And I'll be there to say I told you so.

Please send payment.

[Quoted text hidden]

4/5/24, 9:36 AM

Gmail - Update Regarding Attorney's Fees



Austin de Tagle <sonoftagle@gmail.com>

Update Regarding Attorney's Fees

Tue, Mar 19, 2024 at 12:24 PM

Dennis Ingols <dennis@ingolslaw.com>
To: Austin De Tagle 2023 <sonoftagle@gmail.com>

Mr. De Tagle,

You once again failed to attend court. This morning, the Court ruled on Elizabeth's anti-SLAPP motion and struck the Complaint. Furthermore, you were ordered to pay me \$3,600 in attorney's fees. You can expect a written copy within the next couple of weeks.

This now brings the total attorney's fees that you owe me to \$6,600 plus interest. This number consists of the following:

Family Court Order from last April of \$2,500, minus \$1,000 that you paid;
Family Court Order from last December of \$2,500, of which you have paid \$0;
Today's Order for \$3,600;
Plus 10% interest per annum by statute.

Pay me by the end of March and I will accept \$6,000 in total.

Looks like you missed your target of collecting \$250,000 from me and \$25,000 from Elizabeth by \$281,600.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/dl



(408) 601-0126
111 North Market Street, Suite #300
San José, CA 95113
www.ingolslaw.com

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4/5/24, 9:36 AM

Gmail - Request for Payment #2



Austin de Tagle <sonoftagle@gmail.com>

Request for Payment #2

Mon, Apr 1, 2024 at 10:36 AM

Law Office of Dennis R Ingols <support@lawpay.com>
To: sonoftagle@gmail.com

Law Office of Dennis R Ingols

Your case against Elizabeth was stricken, and you were ordered to pay me attorney's fees of \$3,600.

For your convenience, our firm accepts secure, online payments through LawPay. Thank you for the courtesy of your prompt payment.

Sincerely,

- Law Office of Dennis R Ingols

Balance Due
\$3,600.00

[VIEW BILL AND PAY](#)

Law Office of Dennis R Ingols
111 N. Market St., Ste. 300, San Jose, CA 95113

Powered by LawPay

4/5/24, 9:37 AM

Gmail - Request for Payment



Austin de Tagle <sonoftagle@gmail.com>

Request for Payment

Wed, Mar 20, 2024 at 1:34 PM

Law Office of Dennis R Ingols <support@lawpay.com>
To: sonoftagle@gmail.com

Law Office of Dennis R Ingols

Your case against Elizabeth was stricken, and you were ordered to pay me attorney's fees of \$3,600.

For your convenience, our firm accepts secure, online payments through LawPay. Thank you for the courtesy of your prompt payment.

Sincerely,

- Law Office of Dennis R Ingols

Balance Due

\$3,600.00

[VIEW BILL AND PAY](#)

Law Office of Dennis R Ingols
111 N. Market St., Ste. 300, San Jose, CA 95113

Powered by LawPay

4/5/24, 9:37 AM

Gmail - [Request received]



Austin de Tagle <sonoftagle@gmail.com>

[Request received]

Wed, Mar 20, 2024 at 5:08 PM

LawPay Customer Support <support@lawpay.com>
Reply-To: LawPay Customer Support <support@lawpay.com>
To: Austin de Tagle <sonoftagle@gmail.com>

##- Please type your reply above this line -##

Your request (1470113) has been received and is being reviewed by our LawPay Support Team. We will get back to you shortly.

To add additional comments, you can simply reply to this email.

Thank you!

This email is a service from LawPay.

[RJY56-G9YER]

4/5/24, 9:37 AM

Gmail - Fwd: Filing Accepted for case#23CV425839 with submission id#14702452

Austin de Tagle <sonoftagle@gmail.com>



Fwd: Filing Accepted for case#23CV425839 with submission id#14702452

Mon, Mar 18, 2024 at 1:36 PM

Dennis Ingols <dennis@ingolslaw.com>
 To: Austin De Tagle 2023 <sonoftagle@gmail.com>

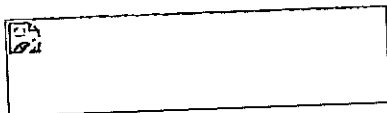
Mr. De Tagle,

Attached please find a file-endorsed copy of my request for fees and costs related to your frivolous lawsuit against me.

Sincere,y

Dennis R. Ingols, Esq.

Pronouns: he/him/él



(408) 601-0126
 111 North Market Street, Suite #300
 San José, CA 95113
www.ingolslaw.com

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----- Forwarded message -----

From: <support@filetime.com>
 Date: Mon, Mar 18, 2024 at 8:42 AM
 Subject: Filing Accepted for case#23CV425839 with submission id#14702452
 To: <dennis@ingolslaw.com>



≡ Fast and Reliable

Accepted Submission Notification

The following submission has been processed by the clerk of court:

Submission ID:
 14702452

Submission Date & Time:
 03/14/24 10:44 AM PDST

Cause No:
 23CV425839
Client ID:
 business owner

4/5/24, 9:37 AM

Gmail - Fwd: Filing Accepted for case#23CV425839 with submission Id#14702452

Plaintiff:

Austin Tagele

Defendant:

Dennis Ingols

Document:

dec CIVIL re fees_Redacted.pdf

Case Information**Case Title:**

Austin Tagele vs Dennis Ingols

Jurisdiction:

Santa Clara – Civil

Case Category:

Civil - Unlimited

Case Type:

Other non-PI/PD/WD Tort

Payment Account:

Operating

Client ID:

business owner

Cause No:

23CV425839

Attorney:

Dennis R. Ingols

Filer:

Dennis R. Ingols

Fees Breakdown**Court Fees****Application**

Filing Fee \$0.00

Total Fee For This Filing \$0.00

Submission Fees

Court Service Fee \$2.05

eFiling Manager
Convenience Fee \$0.26

FileTime Service Fee \$2.99

Sales Tax on FileTime Fee \$0.25

Total Submission Fees \$9.05

Total Fees for this Filing \$9.05

**Credit Card Information for
This Filing**Your credit card statement will
show:**Pleading**

Jurisdiction \$2.05

eFiling Manager \$7.00


Case Parties

Party Type	Name	Our Client
Plaintiff	Austin Tagele	No
Defendant	Dennis Ingols	No

Filings

Filing Type: eFile & eServe

Filing	Documents	Type	Security
Application	dec CIVIL re fees_Redacted.pdf	Lead Document	Public
	Stamped__dec CIVIL re fees_Redacted.pdf		
Filing Description: Application			

 dec CIVIL re fees_Redacted.pdf
661K

4/5/24, 9:38 AM

Gmail - Fwd: Filing Accepted for case#23CV425839 with submission id#14702452



Austin de Tagle <sonoftagle@gmail.com>

Fwd: Filing Accepted for case#23CV425839 with submission id#14702452

Tue, Mar 19, 2024 at 3:10 PM

Dennis Ingols <dennis@ingolslaw.com>
To: Austin de Tagle <sonoftagle@gmail.com>

You are now a vexatious litigant. You will probably have to pay a bond.

It will be the same outcome as last time. You will lose. You will be sanctioned.

You have been warned.

Per my other email, the amount is now nearly \$7,000. Please send payment.
[Quoted text hidden]

Gmail - Request for Payment #10

4/5/24, 9:39 AM

Austin de Tagle <sonoftagle@gmail.com>



Request for Payment #10

Wed, Feb 28, 2024 at 1:47 PM

Law Office of Dennis R Ingols <support@lawpay.com>
To: sonoftagle@gmail.com

Law Office of Dennis R Ingols

For your convenience, our firm accepts secure, online payments through LawPay.

Thank you for the courtesy of your prompt payment of the sanctions ordered against you on December 7, 2023.

- Law Office of Dennis R Ingols

Balance Due

\$1,500.00

[VIEW BILL AND PAY](#)

Law Office of Dennis R Ingols
111 N. Market St., Ste. 300, San Jose, CA 95113

Powered by LawPay

4/5/24, 9:39 AM

Gmail - Request for Payment



Austin de Tagle <sonoftagle@gmail.com>

Request for Payment

Wed, Feb 28, 2024 at 1:47 PM

Law Office of Dennis R Ingols <support@lawpay.com>
To: sonoftagle@gmail.com

Law Office of Dennis R Ingols

Mr. De Tagle,

I previously offered to settle the April sanctions order of \$2,500 for \$2,000 if you could pay promptly. You then sent me your credit card info, and I processed two payments, per your instructions.

Your bank processed one payment for \$1,000 and rejected the other. I offered to honor the discount for prompt payment of the balance. You did not respond. My generous offer has now expired, and the balance is now due in full, and interest is accruing.

Thank you,

- Law Office of Dennis R Ingols

Attachment:
FOAH 4.5.23.pdf

Balance Due

\$1,500.00

[VIEW BILL AND PAY](#)

Law Office of Dennis R Ingols
111 N. Market St., Ste. 300, San Jose, CA 95113

Powered by LawPay

Gmail - (no subject)

3/14/24, 2:57 PM



Austin de Tagle <sonoftagle@gmail.com>

(no subject)

Tue, Mar 5, 2024 at 9:48 AM

Dennis Ingols <dennis@ingolslaw.com>
To: Austin de Tagle <sonoftagle@gmail.com>

And I win again. You will not win any of your cases. Not against me. Not against the DA. Not against Elizabeth. Not against the judges. NONE.

Please focus on your mental health.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him



(408) 601-0126
111 North Market Street, Suite #300
San José, CA 95113
www.ingolslaw.com

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[Quoted text hidden]

Gmail - (no subject)

3/14/24, 2:57 PM

Austin de Tagle <sonoftagle@gmail.com>



(no subject)

Tue, Mar 5, 2024 at 6:20 PM

Dennis Ingols <dennis@ingolslaw.com>
To: Austin de Tagle <sonoftagle@gmail.com>

Mr. De Tagle,

Please, enlighten me: How is it that my anti-SLAPP was unsuccessful? The motion was granted. You are now a vexatious litigant, too.

What do you think will happen on April 30th? Please let me know what happens. I won't be there.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him



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San José, CA 95113
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[Quoted text hidden]

Gmail - [Request received]

3/14/24, 2:58 PM

Austin de Tagle <sonoftagle@gmail.com>



[Request received]

Sun, Mar 10, 2024 at 9:38 PM

LawPay Customer Support <support@lawpay.com>
Reply-To: LawPay Customer Support <support@lawpay.com>
To: Austin de Tagle <sonoftagle@gmail.com>

##- Please type your reply above this line -##

Your request (1459865) has been received and is being reviewed by our LawPay Support Team. We will get back to you shortly.

To add additional comments, you can simply reply to this email.

Thank you!

This email is a service from LawPay.

[YG0G33-2XLLP]

Gmail - For your records

3/14/24, 2:58 PM

Austin de Tagle <sonoftagle@gmail.com>



For your records

Sun, Mar 3, 2024 at 5:53 PM

Dennis Ingols <dennis@ingolslaw.com>
To: Austin de Tagle <sonoftagle@gmail.com>

Mr. De Tagle,

I urge you to do some further reading to educate yourself about the rules of appellate procedure. You simply cannot just take a case straight to the Supreme Court. You have to go through the process in the lower court, file with the Court of Appeals if you're unhappy with the outcome, and then petition the Supreme Court if you feel like the Court of Appeals is wrong. You haven't done that, so none of your Supreme Court cases are going anywhere. This is especially true when you skip court.

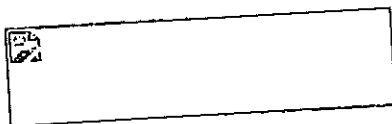
I know that you feel that you are leading some sort of movement for broad, sweeping reforms to family court. You're not. I know that you think you're going to have me disbarred. You're not. I know that you think you're going to collect hundreds of millions of dollars. You're not.

You're only distracting yourself from what should be your real mission - reunifying with your children.

I urge you again, please take care of yourself,

Dennis R. Ingols, Esq.

Pronouns: he/him



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111 North Market Street, Suite #300
San José, CA 95113
www.ingolslaw.com

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[Quoted text hidden]

Gmail - For your records

3/14/24, 2:58 PM

Austin de Tagle <sonoftagle@gmail.com>



For your records

Sun, Mar 3, 2024 at 4:30 PM

Dennis Ingols <dennis@ingolslaw.com>
To: Austin De Tagle 2023 <sonoftagle@gmail.com>

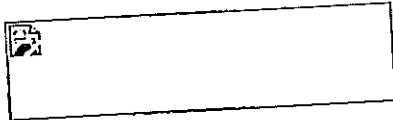
For your records, attached please find the Minute Orders for the hearings you skipped in family court this week.

As you can see, your Request for Order to modify custody and visitation was taken off calendar based on your failure to appear.

See you on Tuesday,

Dennis R. Ingols, Esq.

Pronouns: he/him



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San José, CA 95113
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2 attachments

MO 2.26.24.pdf
102K

MO 2.28.24.pdf
102K

Gmail - Perjury

3/14/24, 2:59 PM

Austin de Tagle <sonoftagle@gmail.com>



Perjury

Fri, Mar 1, 2024 at 2:13 PM

Dennis Ingols <dennis@ingolslaw.com>
To: Austin De Tagle 2023 <sonoftagle@gmail.com>

Mr. De Tagle,

It appears that, quite hypocritically, you've committed perjury. According to the attached Proof of Electronic Service, you declared, under penalty of perjury, that you electronically served me with documents listed in an attachment.

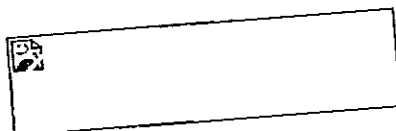
1. I have not received any documents from you via electronic means today.
2. Your Proof of Electronic Service did not contain an attachment specifying the documents you claimed to have served.

Furthermore, I have not, and will not, consent to service by electronic means.

Happy Friday,

Dennis R. Ingols, Esq.

Pronouns: he/him



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POES his oppo.pdf
35K

Gmail - Request for Payment #10

3/14/24, 2:59 PM

Austin de Tagle <sonoftagle@gmail.com>



Request for Payment #10

Wed, Feb 28, 2024 at 1:47 PM

Law Office of Dennis R Ingols <support@lawpay.com>
To: sonoftagle@gmail.com

Law Office of Dennis R Ingols

For your convenience, our firm accepts secure, online payments through LawPay.

Thank you for the courtesy of your prompt payment of the sanctions ordered against you on December 7, 2023.

- Law Office of Dennis R Ingols

Balance Due

\$1,500.00

[VIEW BILL AND PAY](#)

Law Office of Dennis R Ingols
111 N. Market St., Ste. 300, San Jose, CA 95113

Powered by LawPay

Gmail - Request for Payment #11

3/14/24, 2:59 PM

Austin de Tagle <sonoftagle@gmail.com>



Request for Payment #11

Sun, Mar 10, 2024 at 9:38 PM

Austin de Tagle <sonoftagle@gmail.com>
To: Law Office of Dennis R Ingols <support@lawpay.com>

Mr. Ingols,
You're not getting what your asking for please stop harassing me this is above a lower court its out of your league
[Quoted text hidden]

Gmail - Request for Payment #11

3/14/24, 2:59 PM

Austin de Tagle <sonoftagle@gmail.com>



Request for Payment #11

Sun, Mar 10, 2024 at 7:00 PM

Law Office of Dennis R Ingols <support@lawpay.com>
To: sonoftagle@gmail.com

Law Office of Dennis R Ingols

For your convenience, our firm accepts secure, online payments through LawPay.

Thank you for the courtesy of your prompt payment of the sanctions ordered against you on December 7, 2023.

- Law Office of Dennis R Ingols

Balance Due

\$1,500.00

[VIEW BILL AND PAY](#)

Law Office of Dennis R Ingols
111 N. Market St., Ste. 300, San Jose, CA 95113

Powered by LawPay

Gmail - Request for Payment

3/14/24, 3:00 PM

Austin de Tagle <sonoftagle@gmail.com>



Request for Payment

Wed, Feb 28, 2024 at 1:47 PM

Law Office of Dennis R Ingols <support@lawpay.com>
To: sonoftagle@gmail.com

Law Office of Dennis R Ingols

Mr. De Tagle,

I previously offered to settle the April sanctions order of \$2,500 for \$2,000 if you could pay promptly. You then sent me your credit card info, and I processed two payments, per your instructions.

Your bank processed one payment for \$1,000 and rejected the other. I offered to honor the discount for prompt payment of the balance. You did not respond. My generous offer has now expired, and the balance is now due in full, and interest is accruing.

Thank you,

- Law Office of Dennis R Ingols

Attachment:
FOAH 4.5.23.pdf

Balance Due

\$1,500.00

[VIEW BILL AND PAY](#)

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Law Office of Dennis R Ingols
111 N. Market St., Ste. 300, San Jose, CA 95113

Gmail - Request for Update

3/14/24, 3:00 PM

Austin de Tagle <sonoftagle@gmail.com>



Request for Update

Thu, Mar 14, 2024 at 10:36 AM

Austin de Tagle <sonoftagle@gmail.com>
To: Dennis Ingols <dennis@ingolslaw.com>

Mr. Ingols your using intimidation tactics again that violates my rights under the ADA, I will press charges
[Quoted text hidden]

Gmail - Request for Update

3/14/24, 3:00 PM

Austin de Tagle <sonoftagle@gmail.com>



Request for Update

Thu, Mar 14, 2024 at 10:40 AM

Dennis Ingols <dennis@ingolslaw.com>
To: Austin de Tagle <sonoftagle@gmail.com>

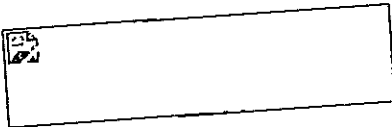
And again, I'm telling you, begging you even, please tell the police that you want to press charges because I've asked you to comply with court orders. When they stop laughing, please send me your payment.

Also, attached please find a copy of my request for attorney's fees and sanctions that I will e-file this morning based on the Court's granting my anti-SLAPP motion.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él



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111 North Market Street, Suite #300
San José, CA 95113
www.ingolslaw.com

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[Quoted text hidden]

dec CIVIL re fees_Redacted.pdf
596K

Gmail - Request for Update

3/14/24, 3:00 PM

Austin de Tagle <sonoftagle@gmail.com>



Request for Update

Wed, Mar 13, 2024 at 7:47 PM

Dennis Ingols <dennis@ingolslaw.com>
To: Austin de Tagle <sonoftagle@gmail.com>

Mr. De Tagle,

You're going to file a CHRO against me? Again? How are you going to do that, now that you have been found to be a vexatious litigant? Do you really think the result will be any different? Why?

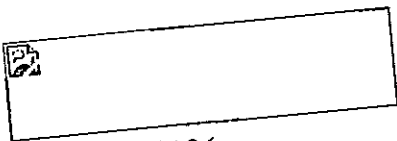
Are you going to pay the bond that they will require of you? Also, do you know who gets that bond money after your next filing is stricken on another anti-SLAPP?

Please do show the police my emails asking you to comply with court orders. Please let me know what they tell you about that.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él



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[Quoted text hidden]

Gmail - Request for Update

3/14/24, 3:01 PM

Austin de Tagle <sonoftagle@gmail.com>



Request for Update

Wed, Mar 13, 2024 at 7:32 PM

Austin de Tagle <sonoftagle@gmail.com>
To: Dennis Ingols <dennis@ingolslaw.com>

Mr. Ingols you continue to email me and harass me I have asked you multiple times so at this point I will call San Jose Police and show them the emails and unwanted videos of you sending me. I will file for a civil harassment restraining order, its clear your not all that smart. I will not be paying you and I do not care about the orders Mr.Ingols. I have a mental health disability your violating my rights under the ADA and I will take you to the court of appeals if it is denied again.

[Quoted text hidden]

Gmail - Request for Update

3/14/24, 3:01 PM

Austin de Tagle <sonoftagle@gmail.com>



Request for Update

Thu, Mar 14, 2024 at 10:36 AM

Austin de Tagle <sonoftagle@gmail.com>
To: Dennis Ingols <dennis@ingolslaw.com>

Mr. Ingols your using intimidation tactics again that violates my rights under the ADA, i will press charges
[Quoted text hidden]

Gmail - Request for Update

3/14/24, 3:01 PM

Austin de Tagle <sonoftagle@gmail.com>



Request for Update

5 messages

Tue, Mar 12, 2024 at 2:16 PM

Dennis Ingols <dennis@ingolslaw.com>
 To: Austin De Tagle 2023 <sonoftagle@gmail.com>

Mr. De Tagle,

Please tell me when I can expect you to comply with the Court's order that you respond to discovery.

Please tell me when I can expect you to comply with the Court's April 2023 order that you pay sanctions.

Please tell me when I can expect you to comply with the Court's December 2023 order that you pay sanctions.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him



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 111 North Market Street, Suite #300
 San José, CA 95113
www.ingolslaw.com

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Wed, Mar 13, 2024 at 7:32 PM

Austin de Tagle <sonoftagle@gmail.com>
 To: Dennis Ingols <dennis@ingolslaw.com>

Mr. Ingols you continue to email me and harass me I have asked you multiple times so at this point I will call San Jose Police and show them the emails and unwanted videos of you sending me. I will file for a civil harassment restraining order, its clear your not all that smart. I will not be paying you and I do not care about the orders Mr.Ingols. I have a mental health disability your violating my rights under the ADA and I will take you to the court of appeals if it is denied again.

[Quoted text hidden]

Wed, Mar 13, 2024 at 7:47 PM

Dennis Ingols <dennis@ingolslaw.com>
 To: Austin de Tagle <sonoftagle@gmail.com>

Mr. De Tagle,

You're going to file a CHRO against me? Again? How are you going to do that, now that you have been found to be a vexatious litigant? Do you really think the result will be any different? Why?

Gmail - Request for Update

3/14/24, 3:01 PM

Are you going to pay the bond that they will require of you? Also, do you know who gets that bond money after your next filing is stricken on another anti-SLAPP?

Please do show the police my emails asking you to comply with court orders. Please let me know what they tell you about that.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él



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111 North Market Street, Suite #300
San José, CA 95113
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[Quoted text hidden]

Thu, Mar 14, 2024 at 10:36 AM

Austin de Tagle <sonoftagle@gmail.com>
To: Dennis Ingols <dennis@ingolslaw.com>

Mr. Ingols your using intimidation tactics again that violates my rights under the ADA, I will press charges

[Quoted text hidden]

Thu, Mar 14, 2024 at 10:40 AM

Dennis Ingols <dennis@ingolslaw.com>
To: Austin de Tagle <sonoftagle@gmail.com>

And again, I'm telling you, begging you even, please tell the police that you want to press charges because I've asked you to comply with court orders. When they stop laughing, please send me your payment.

Also, attached please find a copy of my request for attorney's fees and sanctions that I will e-file this morning based on the Court's granting my anti-SLAPP motion.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él

Gmail - Request for Update

3/14/24, 3:01 PM



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[Quoted text hidden]



dec CIVIL re fees_Redacted.pdf
596K

Gmail - Tomorrow

3/14/24, 3:01 PM

Austin de Tagle <sonoftagle@gmail.com>



Tomorrow

Mon, Mar 4, 2024 at 8:15 PM

Dennis Ingols <dennis@ingolslaw.com>
To: Austin De Tagle 2023 <sonoftagle@gmail.com>

Mr. De Tagle,

How are you feeling about your chances for the big day tomorrow?

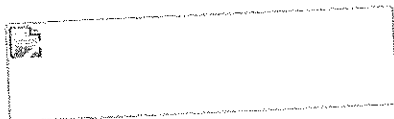
When you lose, don't say I didn't warn you.

Good night,

Mr. Ingols harasses me the day prior to
a criminal court case that is irrelevant
to him or his law offices.

Dennis R. Ingols, Esq.

Pronouns: he/him



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Gmail - Update

3/14/24, 3:01 PM

Austin de Tagle <sonoftagle@gmail.com>



Update

Wed, Feb 28, 2024 at 10:19 PM

Dennis Ingols <dennis@ingolslaw.com>
To: Austin de Tagle <sonoftagle@gmail.com>

Austin,

The antiSLAPP will be granted, just like it was last time. Are you going to sue the judge for that, too?

Your Supreme Court cases will be rejected, just like the first one was. Are you going to sue the Supreme Court when they reject your cases?

I'm still waiting for Mayor Mahan, Rob Bonta, and/or Merrick Garland to come for me and my practice, by the way. Did they tell you when they would be doing that?

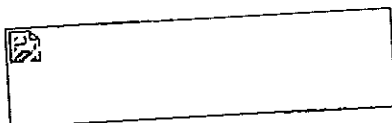
Do yourself a favor. Drop the lawsuits and focus on your mental health. You missed two court dates this week where you would've had the opportunity to explain why you should have time with your kids. Instead, you're filing frivolous lawsuits that are destined to fail.

Your sanctions are overdue. Please use the links I sent you to pay them.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him



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www.ingolslaw.com

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[Quoted text hidden]

Gmail - Update

3/14/24, 3:02 PM

Austin de Tagle <sonoftagle@gmail.com>



Update

Thu, Feb 29, 2024 at 5:40 AM

Dennis Ingols <dennis@ingolslaw.com>
To: Austin de Tagle <sonoftagle@gmail.com>

See you on Wednesday. We'll see who is a boss.

I bet you'll just stand there without saying anything intelligent when the judge tells you that I win, just like every other time. Then you'll whine and complain about it afterwards.

Take care,

Dennis R. Ingols, Esq.

Pronouns: he/him



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111 North Market Street, Suite #300
San José, CA 95113
www.ingolslaw.com

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[Quoted text hidden]

3/14/24, 3:02 PM

Gmail - Update



Austin de Tagle <sonoftagle@gmail.com>

Update

Wed, Feb 28, 2024 at 1:49 PM

Dennis Ingols <dennis@ingolslaw.com>
To: Austin De Tagle 2023 <sonoftagle@gmail.com>

Mr. De Tagle,

I haven't heard from you in a while, and I hope you are doing well.

You missed court on Monday morning, and again this afternoon.

I also write to inquire about your compliance with the Court's orders regarding discovery and payment of attorney's fees. When can I expect to receive your documents? Your payments?

Thank you,

Dennis R. Ingols, Esq.

Pronouns: he/him



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111 North Market Street, Suite #300
San José, CA 95113
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Search mail

25 of 62

Request for Payment #10 (inbox x)

Law Office of Dennis R Ingols <support@lawpay.com>

to me

Wed, Feb 28, 1:47 PM (5 days ago)

Law Office of Dennis R Ingols

For your convenience, our firm accepts secure, online payments through LawPay.

Thank you for the courtesy of your prompt payment of the sanctions ordered against you on December 7, 2023.

-- Law Office of Dennis R Ingols

Balance Due

\$1,500.00

VIEW BILL AND PAY

22 of 62

Update Inbox x

Dennis Ingols <dennis@ingolslaw.com>

to me ▼

Mr. De Tagle,

I haven't heard from you in a while, and I hope you are doing well.

You missed court on Monday morning, and again this afternoon.

I also write to inquire about your compliance with the Court's orders regarding discovery and payment of attorney's fees. When can I expect to receive your documents? Your payments?

Thank you,

Dennis R. Ingols, Esq.

Pronouns: he/him

Request for Payment - sonofflagle@gmail.com - Gmail - Google Chrome

mail.google.com/mail/u/0/popout?ver=1g3yrttb29lwb&search=inbox&th=%23thread-f%3A1792180834846654257&cvi...



Request for Payment

Inbox x

Law Office of Dennis R Ingols <support@lawpay.com>

Wed, Feb 28, 1:47 PM (5 days ago)

to me

Law Office of Dennis R Ingols

Mr. De Tagle,

I previously offered to settle the April sanctions order of \$2,500 for \$2,000 if you could pay promptly. You then sent me your credit card info, and I processed two payments, per your instructions.

Your bank processed one payment for \$1,000 and rejected the other. I offered to honor the discount for prompt payment of the balance. You did not respond. My generous offer has now expired, and the balance is now due in full, and interest is accruing.

Thank you,

- Law Office of Dennis R Ingols

- Law Office of Dennis R Ingols

Attachment:

FOIAH 4 5 23 .pdf

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA
IN AND FOR THE SIXTH APPELLATE DISTRICT

Dennis
Lucas

No. H051957

Defendant
Real Party in Interest
Elizabeth Sanchez

Petition for Writ of Custody
Santa Clara County Superior Court (TCPD00822)
Honorable Cindy Hendrickson
Department 65

[IMMEDIATE] STAY REQUESTED
[IMMEDIATE] RELIEF REQUESTED

Austin Orlando Sanchez de Tagle
1645 Parkside Ave
San Jose, CA 95125
(408) 890-4898
OrlandoSanchezdeTagle@gmail.com

1
SANCHEZ DE TAGLE VS. SUPERIOR COURT OF CALIFORNIA COUNTY OF SANTA CLARA



Re:

message

Tue, May 21, 2024 at 6:59 AM

Dennis Ingols <dennis@ingolslaw.com>

o: Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com>

You cannot represent your children in a lawsuit. Surely you've learned that already, as that was pointed out to you in one of the other lawsuits that you've already lost.

Dennis R. Ingols, Esq.

Pronouns: he/him/él



(408) 601-0126

111 North Market Street, Suite #300

San José, CA 95113

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On Tue, May 21, 2024 at 6:53 AM Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com> wrote:
Well, I do believe Elizabeth is violating her own children's civil rights. I'm gonna also use that in the lawsuit against her. My children have civil rights, I'm sure you can inform your client the severity of such a lawsuit



Re:
message

Tue, May 21, 2024 at 6:24 AM

Dennis Ingols <dennis@ingolslaw.com>
To: Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com>

Stop filing frivolous cases, Orlando. They will all be dismissed. More attorney's fees will be ordered against you. We will win. You will lose. Again. And again.

Focus of your mental health and reuniting with your children. These frivolous lawsuits are keeping you from achieving your real goal of reunification.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él



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On Tue, May 21, 2024 at 6:20 AM Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com> wrote:
I will put the Northern District lawsuit together against Elizabeth Sanchez. It's gonna be simple and to the point. Section 504 (Rehabilitation act) 29 U.S.C 701, 42 U.S.C 1983 American Disabilities Act 1990.



Tue, May 21, 2024 at 6:21 AM

Re: message

Dennis Ingols <dennis@ingolslaw.com>
To: Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com>

What does "I'll have to tax the both of you extra" mean?

You want to "negotiate" the terms of custody in exchange for dropping a frivolous civil rights lawsuit that you know that you will not win?

You do realize that Elizabeth didn't take your benefits, right? The Department of Child Support Services did.

You have much to learn of the way things actually work, Orlando.

Dennis R. Ingols, Esq.

Pronouns: he/him/él

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On Tue, May 21, 2024 at 6:14 AM Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com> wrote:
Good morning Mr. Ingols,

I'd like to offer you and your client the troubles of a civil rights lawsuit by negotiating the terms of custody. I believe that is very reasonable offer, it's better than Elizabeth having a \$100k civil rights lawsuit for taking my governmental benefits by opening a child support case and discriminating against me under the ADA. I want you to help your client out here I, I'm bringing resolution to this matter. I hope you both understand, and the fact there's been a restraining order placed on my children I'll have to tax the both of you extra. So please think long and hard about this.



Mon, May 20, 2024 at 8:29 PM

Re: message

Dennis Ingols <dennis@ingolslaw.com>
To: Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com>

You have nothing. Didn't you read the anti-SLAPP papers?

What should I have learned so far? That I'm always right and you're always wrong? I already knew that.

Take care of your mental health so that maybe one day you can see your children again. Please, stop with the litigation - it's taking your focus away from where it should be.

Sincerely,

Dennis R. Ingols, Esq.

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On Mon, May 20, 2024 at 6:24 PM Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com> wrote:

Mr Ingols,

All those threatening emails of having to go to jail and garnishing my benefits. Man you don't learn, I believe I have enough on you, be asking for attorney fees as well. I'm giving you a chance to have my money it's the least I can do for you is be kind about it



Re:

message

Mon, May 20, 2024 at 8:22 PM

Dennis Ingols <dennis@ingolslaw.com>
To: Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com>

Orlando,

Please learn to spell check. Your poor grammar, syntax, and spelling make it hard to take you seriously.

You said: Your gonna loose against me in the northern district court you should of thought long and hard Dennis. You thought you can take governmental benefits from me lol dumb ass

Proper English: You're going to lose against me in the Northern District Court. You should have thought long and hard Dennis. You thought you could take governmental benefits from me? LOL. Dumbass.

I hope this helps.

Dennis R. Ingols, Esq.

Pronouns: he/him/él



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On Mon, May 20, 2024 at 6:12 PM Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com> wrote:
Your gonna loose against me in the northern district court you should of thought long and hard Dennis. You thought you can take governmental benefits from me lol dumb ass



Mon, May 20, 2024 at 12:52 PM

Re: message

Dennis Ingols <dennis@ingolslaw.com>
To: Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com>

Be sure to include the emails you sent in your Complaint to show how you were falsely arrested.
Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él



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On Mon, May 20, 2024 at 11:20 AM Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com> wrote:

Mr. Ingols,

I notice you like attending my criminal court case so let me bring you up too speed on my last case for now. After this is dismissed then I can go for the 4th amendment false arrest. Anyways you have a great day knowing you wont get a thing from me and nothing is going to happen to me. That is the best part!



Mon, May 20, 2024 at 1:53 PM

Re: message

Dennis Ingols <dennis@ingolslaw.com>
To: Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com>

There is a court order for you to appear at the hearing today. You are not doing yourself any favors, and you are in fact hurting your chances at reunifying with your children by continuing to violate court orders.

https://www.scsccourt.org/general_info/ra_teams/video_hearings_teams.shtml

Department 65. Afternoon session.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él



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On Mon, May 20, 2024 at 11:20 AM Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com> wrote:

Mr. Ingols,
I notice you like attending my criminal court case so let me bring you up too speed on my last case for now. After this is dismissed then I can go for the 4th amendment false arrest. Anyways you have a great day knowing you wont get a thing from me and nothing is going to happen to me. That is the best part!



le:

message

Wed, May 22, 2024 at 9:00 AM

Dennis Ingols <dennis@ingolslaw.com>
o: Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com>

What you call "threats" are actually reminders of the importance of complying with existing court orders. I am glad to hear that you are working with your psychiatrist because I've told you all along that that is where your focus should be, rather than on all of your frivolous lawsuits. Take care of yourself, get better, and hopefully, we can find a way for you to reestablish contact with your children.

Alternatively, you can keep going the way you're going, you won't reunify with your children, you will owe me 5-figures in sanctions and interest, and you'll end up in jail on contempt.

Make the smart decision. I know you can do it.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él



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On Wed, May 22, 2024 at 8:56 AM Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com> wrote:

Mr Ingols,

Due to the recent threats and attempts to extort me of my benefits my psychiatrist has had to raise my medication. You are a direct threat under the ADA. This is your fault, but I'll seek attorney fees as well for this. I warned you



Wed, May 22, 2024 at 9:13 AM

Re:
message

Dennis Ingols <dennis@ingolslaw.com>
o: Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com>

Orlando,
Please take care of yourself. This is not helping you at all. You need to talk to a counselor or therapist, in addition to your psychiatrist.

The FBI will not be getting involved.

The Supreme Court will not be getting involved.

There will be no case for "debarrement" (sic).

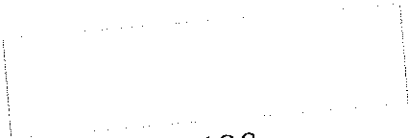
Any case you file against me in Northern District will be dismissed and sanctions will be ordered.

Who is the "Chief" that you refer to? The Chief Justice of the United States Supreme Court? He will not ever hear about any case between you and me. Even if he does, he does not "press charges."

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él



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On Wed, May 22, 2024 at 9:02 AM Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com> wrote:

Mr. Ingols,
Let's please be clear the VA knows EVERYTHING you try and do to me. Now I have to report you to the FBI as my medication has been increased by 5mg. You taunt me with resting my mental health but do everything to take my governmental benefits away from me. I'll add this to the Supreme Court case for your debarrement, I'll inform the bar and add this to the northern district court case against you. Please save these emails and show the Chief, if he reads this inform him I'd like to press charges on you



Re:

message

Tue, May 21, 2024 at 8:25 PM

Dennis Ingols <dennis@ingolslaw.com>

To: Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com>

They'll give you your meds, don't worry.

On Tue, May 21, 2024, 7:08 PM Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com> wrote:

Please Mr Ingols I don't want to spend 5 days in jail without my medication or my benefits. Please, you wouldn't do that to me would you? Violate my civil rights like that? You big bad lawyer youuuuuu



Tue, May 21, 2024 at 8:25 PM

Re:
message

Dennis Ingols <dennis@ingolslaw.com>
To: Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com>

Jail time is the punishment for contempt.

On Tue, May 21, 2024, 7:05 PM Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com> wrote:

Mr Ingols,

Am I in contempt of court?? Awwww 🤔

You want how much of my governmental benefits??

Awwww



Re:

message

Tue, May 21, 2024 at 8:24 PM

Dennis Ingols <dennis@ingolslaw.com>

From: Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com>

Please send me the attorney's information.

On Tue, May 21, 2024, 6:58 PM Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com> wrote:
If you have anymore threats to take my benefits from me please contact my attorney Cherish.



Tue, May 21, 2024 at 7:14 AM

Re: message

Dennis Ingols <dennis@ingolslaw.com>
To: Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com>

No, you cannot file anything for your children. You've already tried. You've already failed. Learn from your mistakes and from all of your losses.

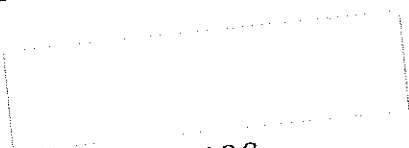
You will not collect a dime from me, from Elizabeth, or from any judge.

The best part is that if somehow you do collect money from the SJPD, that will be taken to pay all the back child support and sanctions. Go get my money. I'm rooting for you.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él



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On Tue, May 21, 2024 at 7:08 AM Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com> wrote:

Mr. Ingols,
Here's the thing I can file for the 14th amendment (equal protection) for my children against Elizabeth. I'm trusting you'll give her legal advice she needs. I'm just giving you some options, I don't want you and her losing all that money. Resolution let's ensure find resolution



le:
message

Wed, May 22, 2024 at 10:08 AM

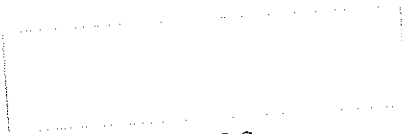
Dennis Ingols <dennis@ingolslaw.com>
To: Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com>

"Obey?" Seriously? You think that I should "obey" you? Try obeying court orders. Pay your child support. Pay your sanctions. Produce your discovery responses. Show up for court.

Please provide me the name of your attorney, as well as a description of the billing arrangement, the source of the funds you used to pay him/her, and which of your myriad cases he/she will be helping you with.

Dennis R. Ingols, Esq.

Pronouns: he/him/él



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On Wed, May 22, 2024 at 10:05 AM Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com> wrote:

Mr. Ingols,
You should of stopped harassing me when I told you to stop. But you don't obey now look, this is what you did, your fault but i have informed my lawyer. Just please obey in the future. Please don't harass me anymore

Mon, May 27, 2024 at 1:13 PM

Re:
message

Dennis Ingols <dennis@ingolslaw.com>
To: Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com>
Happy Memorial Day! Thank you and all the troops for defending the Constitution and the rule of law.
Now follow the Court orders. Pay your sanctions, pay your child support, and produce the discovery.

Sincerely,

On Wed, May 22, 2024, 10:08 AM Dennis Ingols <dennis@ingolslaw.com> wrote:
"Obey?" Seriously? You think that I should "obey" you? Try obeying court orders. Pay your child support. Pay your sanctions. Produce your discovery responses. Show up for court.
Please provide me the name of your attorney, as well as a description of the billing arrangement, the source of the funds you used to pay him/her, and which of your myriad cases he/she will be helping you with.

Dennis R. Ingols, Esq.

Pronouns: he/him/él

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On Wed, May 22, 2024 at 10:05 AM Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com> wrote:
Mr. Ingols,
You should of stopped harassing me when I told you to stop. But you don't obey now look, this is what you did, your fault but informed my lawyer. Just please obey in the future. Please don't harass me anymore



Wed, May 22, 2024 at 9:33 AM

Re: message

Dennis Ingols <dennis@ingolslaw.com>
To: Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com>

What did Mr. Bonta have to say? Please send me a copy of the restraining orders you refer to, and any correspondence between you and Mr. Bonta.

Please explain how restraining orders, issued by a judge, are "grounds for child endangerment."

Please explain how restraining orders, issued by a judge, are "huge child civil rights violation."

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él

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On Wed, May 22, 2024 at 9:29 AM Orlando Sanchez de Tagle <orlandosanchezdetagle@gmail.com> wrote:

Mr Ingols,

Also, I went to Mr. Bonta and I'm going to the FBI on Elizabeth regarding those restraining orders she places on my children. That huge red flag and no no, grounds for child endangerment. This is a huge child civil rights violation, ensure you educate your client



Shame on you, again

message

Wed, May 29, 2024 at 1:24 PM

Dennis Ingols <dennis@ingolslaw.com>
o: Austin De Tagle 2024 <orlandosanchezdetagle@gmail.com>

Mr. De Tagle,

Do not contact my staff again. Your beef is with me.

Your Good Cause Reports don't mean what you think they mean. Surely you know that by now. Which "judge magistrate knows about them?" Magistrate DeMarchi, in your case against SJPD? Why do you think she knows about the Good Cause Reports? You didn't even mention them in the First Amended Complaint.

I see that the Court has authorized a Pro Bono attorney to try to help you with the Settlement Conference. Hopefully, that attorney and/or Magistrate Cousins will help you to see that you will not win your case against SJPD.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él



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Last thing,

Could you please remind Me. Ingols of the two Good Cause reports approved by the deputy district attorney Giselle Espinoza. I have extra copies if he needs them, the judge magistrate knows about them. I don't want more retaliation for using them, and giving testimony. Another civil rights violation. I'm rooting for his law offices to make all the money he can to pay me just like San Jose Police Department is going to.

Best regards,

Mr. Sanchez de Tagle



Shame on you

message

Wed, May 29, 2024 at 12:22 PM

Dennis Ingols <dennis@ingolslaw.com>
o: Austin De Tagle 2024 <orlandosanchezdetagle@gmail.com>

I write in response to your childish threats against my receptionist. She has nothing to do with anything, other than that I asked her to email you a document. Shame on you.

There is no such thing as "42 u.s.c. 1983 sec 12111." If you insist on practicing law without a license, at least try a little harder.

The California State Bar will not do anything to me, as I've done nothing wrong. They have access to the anti-SLAPPs you lost. They have access to the vexatious litigant list. At least as far as you're concerned, all I do is win, and all you do is lose.

Indeed you did tell me a year ago you were going to take my home, my assets, and my business. You tried. You lost. Repeatedly.

I implore you once again, talk to your psychiatrist and a psychologist/counselor. Ask them if endless litigation is good for your mental health (especially given that you keep losing). Tell me what they say.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él

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Mr. Ingols needs to start saving his money for mediation in the northern district court for not obeying civil rights laws.

I will be asking for a restraining order for violating 42 u.s.c 1983 sec 12111. I will contact the bar, he has bigger problem to deal with. I want \$300,000.00 for civil rights violations and for perjury.

I am a qualified individual under the ADA, he was warned. The U S marshals will be serving his law offices.

Please ensure Mr. Ingols has my money or if not I'll put a lean on his home and take his assets like I told him a year ago

Also, because Mr Ingols has harrassed me I have had to increase my medication prescription provided to me by psychiatrist Dr. Smith the VA. It's best if you don't contact me unless you want to involve yourself



shame on you

message

Wed, May 29, 2024 at 12:22 PM

Dennis Ingols <dennis@ingolslaw.com>
o: Austin De Tagle 2024 <orlandosanchezdetagle@gmail.com>

I write in response to your childish threats against my receptionist. She has nothing to do with anything, other than that I asked her to email you a document. Shame on you.

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The California State Bar will not do anything to me, as I've done nothing wrong. They have access to the anti-SLAPPs you lost. They have access to the vexatious litigant list. At least as far as you're concerned, all I do is win, and all you do is lose.

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I implore you once again, talk to your psychiatrist and a psychologist/counselor. Ask them if endless litigation is good for your mental health (especially given that you keep losing). Tell me what they say.

Sincerely,

Dennis R. Ingols, Esq.

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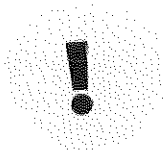
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I am a qualified individual under the ADA, he was warned. The U S marshals will be serving his law offices.

Please ensure Mr. Ingols has my money or if not I'll put a lean on his home and take his assets like I told him a year ago

Also, because Mr Ingols has harrassed me I have had to increase my medication prescription provided to me by psychiatrist Dr. Smit the VA. It's best if you don't contact me unless you want to involve yourself



Dennis Ingols May 21



to me ✓

From Dennis Ingols • dennis@ingolslaw.com

To Orlando Sanchez de Tagle •
orlandosanchezdetagle@gmail.com

Date May 21, 2024, 9:14 PM



Standard encryption (TLS).

[View security details](#)

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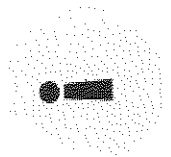
You have blocked dennis@ingolslaw.com.

Unblock sender

Move to Inbox



Don't worry, your children know who takes care of them, who
tucks them in at night, who provides for them.



Dennis Ingols May 21

to me ▾



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Move to Inbox



I keep winning. What exactly are you doing?

**Dennis Ingols** May 21
to me ▾



Why is this message in spam?

You have blocked dennis@ingolslaw.com.

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Move to Inbox



The only thing I'm learning is that you always lose. Obey the judge and avoid contempt.



Dennis Ingols May 21



to me v

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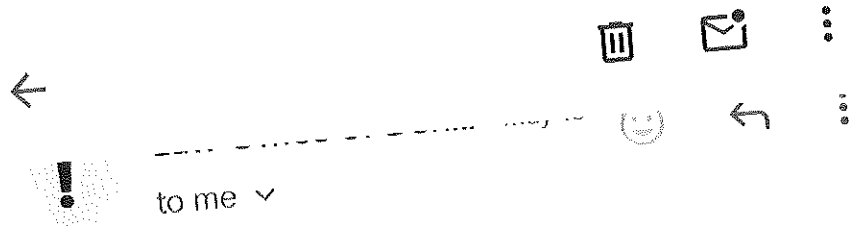
Unblock sender

Move to Inbox



Please learn from your losses. Nothing I do in connection with any case violated your rights.

11:04



Why is this message in spam?
You have blocked support@lawpay.com.

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Law Office of Dennis R Ingols

Your case against Elizabeth was stricken,
and you were ordered to pay me attorney's
fees of \$3,600.

For your convenience, our firm accepts
secure, online payments through LawPay.
Thank you for the courtesy of your prompt
payment.

Sincerely,

- Law Office of Dennis R Ingols

Balance Due
\$3,600.00



Reply



11:05



Why is this message in spam?
You have blocked dennis@ingolslaw.com.

Unblock sender

Move to Inbox



Orlando,

Your second frivolous request for a restraining order was denied, and your case was dismissed today. I win. Again.

Please pay your sanctions, and produce the discovery you were ordered to produce. The contempt hearing is this coming Monday.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él



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111 North Market Street, Suite #300
San José, CA 95113



Reply



11:05



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Law Office of Dennis R Ingols

Mr. De Tagle,

Please pay the sanctions ordered against you in April of 2023. This is independent of the December sanctions against you, and the attorney's fees you were ordered to pay in your frivolous lawsuit against Elizabeth.

Over a year has passed, and interest of 10% will bring your balance due to \$1,650. Pay by the end of the month to avoid the interest charges.

Thank you,

- Law Office of Dennis R Ingols

Attachment:
FOAH 4.5.23.pdf

Balance Due

\$1,500.00



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Tell them I said hi. 😊

On Tue, May 21, 2024, 10:30 AM Orlando Sanchez de Tagle

<orlandosanchezdetagle@gmail.com> wrote:

It's appears that the Mayor and the Governor will have to call upon their emergency management. Thanks to you

On Mon, May 20, 2024, 8:25 PM Dennis Ingols

<dennis@ingolslaw.com> wrote:

You do know that I have to also agree to a Magistrate, right? And that I won't, right?

You do know that I'm a private citizen, representing a client in court, right? So you cannot make a claim that in so doing I've violated your civil rights. You know that right? Surely you must have learned something from the anti-SLAPP, and from all your studies of the U.S. Constitution. Your frivolous case will be dismissed. Again.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él

11:03



Re: Spam



Dennis Ingols May 20



to me ▾

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My goodness, you just don't learn, do you?

You've already sued Estremera. Twice. You lost both times.

You've already sued Hendrickson. You lost.

You've already sued me. You lost.

Please send me a case citation for the Chavez case, as there is more than one case by that name.

You will never collect a dollar from any judge, from any employee of the court, or from me.

Sincerely,

Pronouns: he/him/él



Reply



11:04



Dennis Ingols May 17



to me ▾

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Just in time for Court on Monday, petition for writ of mandate
and for stay denied.

You lost again.

Dennis R. Ingols, Esq.

Pronouns: he/him/él



(408) 601-0126

111 North Market Street, Suite #300

San José, CA 95113

www.ingolslaw.com

This e-mail message and any attachments are confidential
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▼ Reply



11:04



to me ▾



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Law Office of Dennis R Ingols

Your case against Elizabeth was stricken,
and you were ordered to pay me attorney's
fees of \$3,600.

For your convenience, our firm accepts
secure, online payments through LawPay.
Thank you for the courtesy of your prompt
payment.

Sincerely,

- Law Office of Dennis R Ingols

Balance Due

\$3,600.00



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Why is this message in spam?

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Mr. De Tagle,

Attached please find a copy of the signed order dismissing your civil case against me and declaring you a vexatious litigant.

We have court on June 26th to talk about my request for attorney's fees and costs. Please make me an offer before the judge makes an order.

Sincerely,

Dennis R. Ingols, Esq.

Pronouns: he/him/él



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